184980

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CORRESPONDENCE

Let's protect our earth

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
John J. Trela, Ph.D., Acting Director
2 Babcock Place
West Orange, N.J. 07052
201 - 669 - 3960

JUN 0 1 1987

Mr. Steven D. Luftig
Acting Director
Emergency and Remedial Response Division
USEPA - Region II
26 Federal Plaza
New York, NY 10278

Re: International Metallurgical Services (Newark, Essex County)

Dear Mr. Luftig:

The referenced four story building is located at 196 Blanchard Street in Newark, New Jersey. International Metallurgical Services Inc. operated at this site until November, 1984. Principal operations included the recovery of silver from used photographic film, recovery of gold from used electronic circuit boards, and the upgrading of medium grade gold to bullion grade. The company president was Victor Pannone, formerly of Summit New Jersey, present whereabouts unknown.

IMS filed for Chapter 11 on 4-15-82. The filing was changed to involuntary Chapter 7 on 1-6-86 due to the failure of IMS to submit Financial Disclosure Statements and a Plan of Reorganization. Salable equipment was auctioned off by the Court appointed trustee, Santo J. Lalomia, Esq., 140 Market Street, Paterson, New Jersey. After payment to creditors, the reported assets remaining are approximately $1,700 in cash and the building and surrounding grounds. Hazardous wastes remain in containers in the building. (see inventory on attached memo dated 5-9-87).

The abandoned building is vulnerable to periodic vandalism which results in a Departmental response to secure leaking drums. The City of Newark refuses to foreclose on some $98,000 in back property taxes and is requesting assistance in removing the Hazardous Waste. (see attached news item dated 5-9-87).

On May 18, 1987, Mr. John Witkowski of EPA and Mr. Anthony J. Cavalier of the Division's Metropolitan Regional Office discussed the matter, in particular EPA assuming the lead and taking the necessary remedial actions.

Based on these discussions the Department in formally requesting that EPA assume the lead role for the subject site.

The contact person for the Division of Hazardous Waste Management is Anthony J. Cavalier. He will provide you with all available data and reports. Mr. Cavalier, Region Chief of the Metropolitan Regional Office, may be contacted at (201)669-3960.

Thank you for your interest and assistance in this matter.

Very truly yours,

ORIGINAL SIGNED BY
JOHN J. TRELA

John J. Trela, Ph.D.
Director
Division of Hazardous Waste Management

Encl.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 14 1987

John J. Trela, Ph.D., Acting Director
New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
401 E. State Street
CN 028
Trenton, New Jersey 08625

Dear Dr. Trela:

This letter is in response to your request, received on June 1, 1987, that EPA assume the lead role at the International Metallurgical Services (IMS) site in Newark, New Jersey. Your request has been forwarded to Mr. John Witkowski and Mr. John Shaw, On-Scene Coordinators in our Response and Prevention Branch.

On June 19, 1987, Messrs. Witkowski and Shaw, along with Mr. David Beeman of your staff, performed a preliminary assessment of the site. Presently, we are compiling site specific information, preparing plans to sample unknown materials and preparing a detailed inventory of all drums, tanks and containers. This information will then be evaluated and presented for CERCLA removal funding authorization consideration.

We will notify you of subsequent decisions regarding the site. If questions or concerns arise in the interim, please contact Mr. Witkowski at (201) 321-6739 or Mr. Shaw at (201) 906-6827.

Sincerely yours,

Stephen D. Luftig, Director
Emergency and Remedial Response Division

bcc: J. Witkowski, 2ERR-RP
J. Shaw, 2ERR-RP

File: w/Shaw-IMS

~~2ERR:RP:JShaw:340-6610:7-7-87:SS#2:revised 7-10-87:7-13-87,8-5-87~~

CONCURRENCES

SYMBOL	2ERR:RP	2ERR:RP	2ERR:RP	2ERR-OD	2ERR			
SURNAME	Shaw	Cracchos	Rubel	Luftig	Luftig			
DATE	8-7-87	8-7-87	8/7/87	8/14/87	8/14/87			

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

*U.S. GPO : 1986-159-319

1.1

1.2

BACKGROUND/RCRA and OTHER INFORMATION

Total unknown 43 75 GALLON

1st FLOOR INVENTORY

1 of 1

X 2 X 55 gal Hydrochloric Acid 20% Technical (1)
Dorner & Smith Chemical Co.
374 Mulberry Street Newark N.J. 07102
Net wt 500 lbs ONE CONTAINER HAS BEEN OPENED.
Both are full

~~10~~ X 3 X 20 gal. Sulfuric Acid 66% (2)
Dorner & Smith Chemical Co
374 Mulberry Street Newark, N.J. 07102
All have less than an inch of liquid.

1 X 20 gal Ferric Chloride 42% (3)
Dorner & Smith Chemical Co.
374 Mulberry Street, Newark, New Jersey
Less than an inch of liquid

1 X 5 gal Unknown Substance (solid) Full (4)

1 X 5 gal Unknown liquid Full (5)

1 X 55 gal "Fyrquel" Fire Resistant Hydraulic Fluid (6)
Stauffer Chemical Co., Specialty Chemical Division
Westport, CT. 06880 3/4 ±

1 X 55 gal ~~Lit~~ Unknown liquid 3/4 (7)

1 X ~~55~~ 5 gal Unknown liquid in tin can tint. 1/4 th (8)

1 bag Sodium Nitrite, Industrial grade 100 lbs. (9)
3/4 OLIN CHEMICALS
120 Long Ridge Road Stamford, Conn. 06904

X 30 gal Filter packs containing white powder found outside (10)
Full Building entrance.

1st Floor cont.

7 bags — FERROUS SULFATE Other than USP GRADE (11)
(IRON SULFATE - COPPERAS) minimum Fe - 20%
QC corp.
Glen Burnie, Maryland 21061 50 lbs NET

1 X 55 gal — UNKNOWN WHITE SOLID AMT. 3/4 (12)

1 X 55 gal Y2 — Sodium CYANIDE /Possible TRASH (13)

1 X 6.6 gal Full — UNKNOWN BROWN SOLID (14)

1 X 55 Full — UNKNOWN SOLID (15)
DRUM marked: INflammable and DONT move

X 15 gal Full — NICKEL POWDER NET CONTENTS 300 lbs (16)
INCO PEOPLE LIMITED
UNITED Kingdom

1 X 30 gal Full — Nickel POWDER TYPE NET CONTENTS 400lbs (17)
INCO PEOPLE LIMITED
UNITED Kingdom

~~3 X 5 gal~~
3 X 5 gal - FULL — UNKNOWN SUBSTANCE
1 X 5 gal - 3/4

1 big — Asbestos insulation

1 cylinder — ACETYLENE UN001
UNION Carbide Corp. - LINDE DIVISION
Danbury, CT. 06817

2ND FLOOR CONT

1 X 5 gal 3/4	Unknown brown solid
3 X 5 gal Full	~~Rem~~ REMOVER 1112A Alkaline corrosive liquid Shipley Company Inc., Newton, Mass
1 X 5 gal 3/4	Microposit ~~Clapos~~ Posit Accelerator 19 Corrosive liquid Shipley Company Inc., Newton, Mass
1 X 5 gal 3/4	Microposit PREPOSIT ETCH 746 Sulfuric acid solution Shipley Company, Newton, Mass.
1 X 5 gal Full	Unknown corrosive liquid
~~Full~~ 1 box full	Alumina RAM mix (Spartan) 100 lbs. J. H. FRANCE Refractories Company
1 box	Unknown White solid 100 lbs
1 X 5 gal 1/2	Unknown Solid
1 X 55 gal < 1/4	Nitric acid in Aluminum drum Oxidizer / corrosive
2 ~~bags~~ Full	Sodium BiSulfite Anhydrous (Sodium Meta bisulfite) 100 lbs. U.S.P. ; Food grade Industrial Chemical Div., Allied Chemicals Morristown, N.J.
1 X 30 gal 1/2	Asbestos
1 X 5 gal < 1/4	Unknown black liquid

3rd Floor

2 x 5 gal 3/4 — Unknown solid

1 x 40 gal — Drum markings 30% Reagent grade Hydrogen peroxide - Contents inside not the same Unknown material

6 x 30 gal 3/4 — Unknown White solid

1 x 55 gal 1/2 — Unknown Brown Solid material

3 x 30 gal 1/2 — Unknown White Solid

X 30 gal 3/4 — Carborundum Catalyst Carries
Carborundum Company, Refractories & Electronics Division
Latrobe, Pa.

1 x 30 3/4 — Unknown brown solid

2 x 40 gal X2 — Proflexmatic X-Ray Fixer replenisher solution A
Litton Industries.

1 x 20 gal 3/4 — Unknown solid

3 x 30 gal Full — Unknown solid

1 x 30 gal Unknown amt. — SynBox 325 NT
Catalyst Development Corp.
69 Industrial Ave., Little Falls, N.J.
Fragile, Do Not Roll

Third floor cont

4 x 5 gal Full

National Aer-o-Foam 99-6% foam liquid
National Foam System Inc.
Union & Adams STREET, West Chester, Pa.

Third floor cont

4 x 5 gal Full

National Aer-o-Foam 99-6% foam liquid
National Foam System Inc.
Union & Adams Street, West Chester, Pa.

Fourth Floor Inventory

1 X 30 gal 3/4	Riedel-De Haën AG Seelze Hanover 50 kg Dimethylglyoxin (Diacetyldioxim) technical $C_4H_8N_2O_2$
1 X 2 gal 1/4	Unknown solid
1 X 15 gal 1/4	Unknown solid
1 X 5 gal 3/4	Koppers ~~Bitumastic~~ Bitumastic #50 Tar Product Division Koppers Company Inc., Pittsburgh, Pa.
1 X 6 gal Full	Odo-San (~~Bac~~ Washroom cleaner) Active ingredients: N-Alkyl, Dimethyl ~~Benzene~~ Benzyl and Ammonium Chloride — 1.0 % Inert Ingredients : 99 % West Chemical Products, Inc. New York, New York.
1 X 7 gal Full	Sodium Bromate : 35 lbs Oxidizing Material, N.O.S. Fairmount Chemical Co. 117 Blanchard St. Newark, N.J.
1 box 1/2	Unknown Solid
3 bags Full	Corsons Miracle lime for construction 50 ~~lbs~~ lbs G. & W. H. Corson Inc., Plymouth ~~ma~~ Mass
~~1 X 20 gal 1/4~~	~~Unknown metal drum (solid).~~
bag 3/4	Play Sand, Redi-Crete Corp, Flanders, N.J. 60 lbs
2 15 gal 3/4	Unknown Solid

Fourth floor (cont')

1 X 30 gal overpack Full — Sodium Cyanide 96% - 98%

1 X 55 gal overpack Full — Potassium Cyanide

1 X 42 gal Full — Hydrazine Sulfate Technical

1 X 20 gal 3/4 — Tannic Acid, Doerner & Smith Chemical Co. 374-76 - Mulberry Street, Newark, N.J. ?

1 X 40 gal 1/2 — Liquid in brown trash can, boric Acid written on can

1 X 40 gal 3/4 — White solid (unknown)

1 bag Full — (Dehybor Anhydrous Borax) U.S. Borax United States Borax & Chemical Co., Los Angeles

5 bags full 4 bags 1/2 — Hydrated Lime Malern Rotary Kiln Millard Chemical 50lbs. Bethlehem Mines Corp., Millard Quarry, Annville, Pa

3 bags Full — Soda Ash (Light) Sodium Carbonate 100 lbs. Allied Chemical Corp., Morristown, N.J.

1 bag — Asbestos (Amount unknown)

1 X 5 gal 3/4 — Unknown Solid

Fourth floor (con't)

1 - 55 gal overpack — Sodium Cyanide / Possible trash
Unknown

1.4

PRELIMINARY ASSESSMENT (PA) REPORT

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

EPA

I. IDENTIFICATION
01 STATE: NJ | 02 SITE NUMBER: N/A

II. SITE NAME AND LOCATION

01 SITE NAME	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
International Metallurgical Services	196 Blanchard Street

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Newark	NJ	07105	Essex		

09 COORDINATES LATITUDE: 40° 44' 30" | LONGITUDE: 74° 07' 35"

10 DIRECTIONS TO SITE (Starting from nearest public road)
New Jersey Turnpike to Exit 15E, to Raymond Blvd. West on Raymond Blvd. approx ½ mi. Turn right on Blanchard St. Site is the last building on the right hand side of the street

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing, residential)
Victor Pannone, President	Present whereabouts unknown

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
			( )

07 OPERATOR (If known and different from owner)	08 STREET (Business, mailing, residential)

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
			( )

13 TYPE OF OWNERSHIP (Check one)
☒ A. PRIVATE ☐ B. FEDERAL: _____ (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER: Santo La Lomia, Esq (Specify) ☒ G. UNKNOWN Court appointed trustee

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)
☐ A. RCRA 3001 DATE RECEIVED: ___/___/___ (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ___/___/___ (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
☒ YES ☐ NO DATE 07/09/87 (MONTH DAY YEAR)
BY (Check all that apply)
☒ A. EPA ☐ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)
CONTRACTOR NAME(S): _____

02 SITE STATUS (Check one)
☐ A. ACTIVE ☒ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION
unknown (BEGINNING YEAR) | 1984 (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
Strong acids and bases, peroxides, flammable liquids, cyanides, metals, other poisons and oxidizing agents.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
- potential for fire/explosion - surface water contamination - soil contamination
- potential for toxic plume generation - contamination of sewers
- unstable containment of hazardous wastes

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)
☒ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on an opportunity basis) ☐ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
John Witkowski	EPA, Region 2	(201) 321-67

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
John Malool	USEPA	2 ERRD	(201) 321-6614	07/09/87 (MONTH DAY YEAR)

EPA FORM 2070-12 (7-8)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
NJ	N/A

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

- [X] A. SOLID
- [ ] B. POWDER, FINES
- [ ] C. SLUDGE
- [ ] D. OTHER (Specify)
- [ ] E. SLURRY
- [X] F. LIQUID
- [X] G. GAS

02 WASTE QUANTITY AT SITE (Measures of waste quantities must be independent)

TONS: undetermined
CUBIC YARDS:
NO. OF DRUMS:

03 WASTE CHARACTERISTICS (Check all that apply)

- [X] A. TOXIC
- [X] B. CORROSIVE
- [ ] C. RADIOACTIVE
- [ ] D. PERSISTENT
- [ ] E. SOLUBLE
- [ ] F. INFECTIOUS
- [X] G. FLAMMABLE
- [X] H. IGNITABLE
- [X] I. HIGHLY VOLATILE
- [ ] J. EXPLOSIVE
- [ ] K. REACTIVE
- [X] L. INCOMPATIBLE
- [ ] M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS	unknown		
IOC	INORGANIC CHEMICALS	" "		
ACD	ACIDS	" "		
BAS	BASES	" "		
MES	HEAVY METALS	" "		

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
OCC	Acetylene (gas)	74-86-2			
OCC	Ethyl Acetate	141-78-6			
OCC	Metyl Isobutyl Ketone	108-10-1			
OCC	Nitropropane	108-03-2			
OCC	Phenol	108-95-2			
IOC	Hydrazine	302-01-2			
IOC	Sodium Borohydride	1694-066-2			
IOC	Sodium Cyanide	143-33-9			
IOC	Vanadium Pentoxide	1314-62-1			
ACD	Hydrochloric Acid	7647-01-0			
ACD	Nitric Acid	7697-37-2			
BAS	Potassium Hydroxide	1310-58-3			
BAS	Sodium Hydroxide	1310-73-2			
MES	Nickel	7440-02-0			
MES	Zinc	7440-66-6			
	See comments below				

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific references e.g., state files, sample analysis, reports)

Note: The above mentioned chemicals serve as a representitive of the various catagories of hazardous materials / wastes found at this site.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
NJ	N/A

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☒ B. SURFACE WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

This site is situated directly on the banks of the Passaic River. In the event of any release, materials will enter the River, directly.

01 ☒ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

In the event of a fire/explosion or reaction between two un-compatible materials there is the potential for the release of a toxic vapor cloud. This site is situated in an industrial area, adjacent to the NJ Turnpike, Total population at risk unknown.

01 ☒ D. FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Various flammable liquids, in quantity, can be found in the building. Many of these liquids are stored adjacent to un-compatible materials, increasing the liklihood of fire/explosion potential.

01 ☒ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

This site is fairly secure, reducing the immediate threat of direct contact. This does not mean that there does not exist a possibility for vandalism and direct contact occuring.

01 ☒ F. CONTAMINATION OF SOIL — 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: _____ (Acres) 04 NARRATIVE DESCRIPTION

There are approximately 10 above ground storage tanks in the rear yard of this site. This situation increases the potential for soil contamination as these tanks have varying amounts of liquid. The liquid in one tank has a pH of 14.

01 ☐ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☒ I. POPULATION EXPOSURE INJURY — 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

This site is situated in an occupied industrial area. Numerous factories directly adjacent to the site employ an unknown number of people. Located within 1/4 mile of the site is a residential portion of the City of Newark. The New Jersey Turnpike and Route 1 are in immediate vicinity.

1.7

POLLUTION REPORTS

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: February 23, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington,
(E-Mail)
J. Czapor, EPA
R. Cobiella, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	One (1)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
POLLUTANT:	Shock sensitive chemicals, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	450 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River

1. SITUATION:

A. International Metallurgical Services (IMS) is located at 196 Blanchard Street in Newark, New Jersey. IMS operated at this site until November, 1984. Principal operations included the recovery of silver from used photographic film, recovery of gold from used electronic circuit boards, and the upgrading of medium grade gold to bullion grade. The building and surrounding site property are presently abandoned.

B. The previous occupant was Commercial Solvents, now a part of International Minerals and Chemical Corporation.

C. The building is an all concrete and brick, four story structure fronting on Blanchard Street. The building was constructed on piles, one to two feet above grade and is approximately 50 by 130 feet. It is approximately 25 feet from the Passaic River. There is currently no utility

service to the building. It is surrounded on three sides by a fence. However, access may be gained along the embankment of the Passaic River and under parts of the fence.

D. This is a declining industrial area with no residences. The nearest occupied building is a tavern, approximately 40 feet southwest, across Blanchard Street. The abandoned building is vulnerable to periodic vandalism which resulted in a NJDEP response to secure leaking drums. The city of Newark refuses to foreclose on some $98,000 in back property taxes and is requesting assistance in removing the hazardous waste.

E. IMS filed for Chapter 11 on April 15, 1982. The filing was changed to involuntary Chapter 7 on January 6, 1986. Salable equipment was auctioned off by the Court appointed trustee, Santo J. Lalomia, Esq., 140 Market Street, Paterson, New Jersey. Hazardous chemicals and wastes remain in containers in the building.

F. NJDEP conducted several site visits and compiled a fairly detailed inventory of hazardous chemicals found within the building.

G. On June 3, 1987 EPA received a request from NJDEP for EPA to take the lead role.

H. EPA and the NJDEP pursued potential responsible parties causing a temporary delay in this project. The Region is pursuing an innovative enforcement approach to funding this removal action. A prospective buyer of the property may fund the action under a consent order pending agreements by all the State and Federal Agencies involved under all the laws administered by these agencies. Monies expended for the expedited removal would be pursued for reimbursement from the present PRP's only. Perhaps, to free the property from a lien, the consent order with the prosepctive buyer, would contain a provision not to sue for the expedited removal action monies. The issue, of subsurface contamination would also be similarly addressed.

2. ACTION TAKEN:

A. On June 19, 1987, U.S. EPA met with David Beeman of NJDEP at the IMS site. A preliminary site assessment was conducted which included air monitoring. At this time, only HCN was detected at levels as high as 3 ppm. EPA preliminarily confirmed the inventory compiled by NJDEP. Drums, containers, and laboratory chemicals were found inside the building. Windows on the upper floors were opened to better vent the building so the level of protection could be downgraded to "C".

B. Subsequent air analyses found sulfur dioxide and asbestos.

C. Soil sampling indicated beryllium at up to 67 ppm which exceeds the average background of 0.6 ppm for this locale.

D. Notice letters have been sent to several PRP's. To date no responses have been received. The OSC continues to contact other PRP's.

E. An Expedited Action Memorandum was prepared and S. Luftig, Region II ERRD Director authorized $150,000 for the removal of shock sensitive materials on February 10, 1988. Other measures to secure the site and mitigate the threat of fire and explosion will be taken.

F. ERCS was alerted and will meet with the OSC on-site to devleop a detailed plan to address the situation.

3. FINANCIAL STATUS:

See next POLREP.

4. FUTURE PLANS AND RECOMMENDATIONS:

A. To begin removal of shock sensitive materials and take other measures to secure and stabilize the site.

B. To prepare an action memorandum for a full funded complete removal action.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP____ FURTHER POLREPS FORTHCOMING X SUBMITTED BY John J. Shaw

John J. Shaw, OSC
Response and
Prevention Branch

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: March 2, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington, (E-Mail)
J. Czapor, EPA
R. Cobiella, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Two (2)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
POLLUTANT:	Shock sensitive chemicals, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	450 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River

1. SITUATION:

A. International Metallurgical Services (IMS) is located at 196 Blanchard Street in Newark, New Jersey. IMS operated at this site until November, 1984. Principal operations included the recovery of silver from used photographic film, recovery of gold from used electronic circuit boards, and the upgrading of medium grade gold to bullion grade. The building and surrounding site property are presently abandoned.

B. The previous occupant was Commercial Solvents, now a part of International Minerals and Chemical Corporation.

C. The building is an all concrete and brick, four story structure fronting on Blanchard Street. The building was constructed on piles, one to two feet above grade and is approximately 50 by 130 feet. It is approximately 25 feet from the Passaic River. There is currently no utility

service to the building. It is surrounded on three sides by a fence. However, access may be gained along the embankment of the Passaic River and under parts of the fence.

D. This is a declining industrial area with no residences. The nearest occupied building is a tavern, approximately 40 feet southwest, across Blanchard Street. The abandoned building is vulnerable to periodic vandalism which resulted in a NJDEP response to secure leaking drums. The city of Newark refuses to foreclose on some $98,000 in back property taxes and is requesting assistance in removing the hazardous waste.

E. IMS filed for Chapter 11 on April 15, 1982. The filing was changed to involuntary Chapter 7 on January 6, 1986. Salable equipment was auctioned off by the Court appointed trustee, Santo J. Lalomia, Esq., 140 Market Street, Paterson, New Jersey. Hazardous chemicals and wastes remain in containers in the building.

F. NJDEP conducted several site visits and compiled a fairly detailed inventory of hazardous chemicals found within the building.

G. On June 3, 1987 EPA received a request from NJDEP for EPA to take the lead role.

H. EPA and the NJDEP pursued potential responsible parties causing a temporary delay in this project. The Region is pursuing an innovative enforcement approach to funding this removal action. A prospective buyer of the property may fund the action under a consent order pending agreements by all the State and Federal Agencies involved under all the laws administered by these agencies. Monies expended for the expedited removal would be pursued for reimbursement from the present PRP's only. Perhaps, to free the property from a lien, the consent order with the prosepctive buyer, would contain a provision not to sue for the expedited removal action monies. The issue, of subsurface contamination would also be similarly addressed.

I. Hazardous conditions remain.

J. No PRP has accepted responsibility for site cleanup.

K. EPA continues to pursue an innovative approach to involving a prospective buyer of the property as a PRP.

2. ACTION TAKEN:

A. ERCS met with the OSC on February 25. A site survey was conducted by the OSC with ERCS to enable them to familiarize themselves with the site. This, along with the information previously given, will enable ERCS to develop a detailed plan to address the situation.

B. A Notice Letter was sent to International Minerals and Chemicals. It occupied the site prior to IMS.

C. The pursuing of an innovative enforcement approach to funding the removal action continues (See POLREP 1). The OSC has had discussions with ORC and SCB regarding this approach.

3. FINANCIAL STATUS:

A. Total Project Ceiling Authorized	$ 230,000.
B. Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 115,000.
C. Estimate of Total Mitigation Contracts as of 2/25/88	$ 3,000.
D. Other Extramural Costs	
1.a. TAT salary	$ 1,100.
E. Intramural Estimated Costs	$ 6,000.
F. Total Expenditures and Percentages of $2,000,000.	(0.5% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. To begin removal of shock sensitive materials and take other measures to secure and stabilize the site.

B. To prepare an action memorandum for a full funded complete removal action.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP____ FURTHER POLREPS FORTHCOMING X SUBMITTED BY John J. Shaw

John J. Shaw, OSC
Response and
Prevention Branch

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: March 4, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington, (E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Three (3)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
POLLUTANT:	Shock sensitive chemicals, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	450 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River

1. SITUATION:

A. Hazardous conditions remain.

B. No PRP has accepted responsibility for site cleanup.

C. EPA continues to pursue an innovative approach to involving a prospective buyer of the property as a PRP.

2. ACTION TAKEN:

A. On March 3, 1988, electricians from ERC's hooked electricity up in the boiler house, which will tie into the command post and decontamination trailer on March 7, 1988, the date of mobilization. Broken windows on the boiler house were also secured.

B. An information exchange between EPA, the Newark Fire Department and other concerned city departments, was held on March 3, 1988. Discussions focused on the removal operation.

3. FINANCIAL STATUS:

A.	Total Project Ceiling Authorized	$ 230,000.
B.	Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 115,000.
C.	Estimate of Total Mitigation Contracts as of 3/03/88	$ 11,000.
D.	Other Extramural Costs	
	1.a. TAT salary	$ 2,500.
E.	Intramural Estimated Costs	$ 8,000.
F.	Total Expenditures and Percentages of $2,000,000.	(1.07% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. To begin removal of shock sensitive materials and take other measures to secure and stabilize the site.

B. To prepare an action memorandum for a full funded complete removal action.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

E. On March 10, 1988, the Newark Fire Department and other city representatives, plan to conduct a walk through the building to familarize themselves with site.

FINAL POLREP____ FURTHER POLREPS FORTHCOMING X SUBMITTED BY John J. Shaw

John J. Shaw, OSC
Response and
Prevention Branch

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: March 15, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington,
(E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Six (6)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
POLLUTANT:	Shock sensitive chemicals, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	450 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River

1. SITUATION:

A. Hazardous conditions remain.

B. No PRP has accepted responsibility for site cleanup.

C. EPA continues to pursue an innovative approach to involving a prospective buyer of the property as a PRP.

2. ACTION TAKEN:

A. On March 11, 1988, the classification, segregation and securing of chemicals and laboratory reagents continues. A drum marked Sodium Cyanide was found on the fourth floor of building, it was overpacked, labeled and moved to the second floor staging area. One truckload of roadstone was delivered onsite and spread out over exposed areas of ground in the lot.

B. On March 12, 1988, samples of Methyl Ethyl Ketone Peroxide was packaged and shipped to the manufacturer for

analysis. Composite samples were taken from the piles of spent film located at the northside of the building. The exposed piles were then covered and secured with sheets of visqueen. A 25-30 gallon container marked potassium cyanide was found on the fourth floor of the building, along with a 1-3 gallon container marked sodium cyanide. Both containers were placed into seperate overpacked drums, labeled, secured and temporarily stored on the fourth floor. A small vial with a hand written label, Np, was found on the second floor of the building. The vial was placed inside a metal container and moved to an isolated area of the building, bordered with caution tape. Np is the chemical symbol for Neptunium, a radioactive substance.

3. FINANCIAL STATUS:

A.	Total Project Ceiling Authorized	$ 230,000.
B.	Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 115,000.
C.	Estimate of Total Mitigation Contracts as of 3/12/88	$ 36,000.
D.	Other Estimated Extramural Costs	
	1.a. TAT salary	$ 7,000.
E.	Intramural Estimated Costs	$ 21,000.
F.	Total Expenditures and Percentages of $2,000,000.	(3.2% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. To begin removal of shock sensitive materials and take other measures to secure and stabilize the site.

B. To prepare an action memorandum for a full funded complete removal action.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP___ FURTHER POLREPS FORTHCOMING X SUBMITTED BY

John J. Shaw, OSC
Response and
Prevention Branch

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: March 18, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington, (E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.: Seven (7)
INCIDENT NAME: IMS
SITE/SPILL NO.: 1C
POLLUTANT: Shock sensitive chemicals, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION: Major
SOURCE: Abandoned precious metals recovery facility
LOCATION: Newark, New Jersey
AMOUNT: 450 Laboratory containers, 45 tanks and over 100 drums
WATER BODY: Passaic River

1. SITUATION:

A. Hazardous conditions remain.

B. No PRP has accepted responsibility for site cleanup.

C. EPA continues to pursue an innovative approach to involving a prospective buyer of the property as a PRP.

2. ACTION TAKEN:

A. On March 14, 1988, ERCS continued to classify and segregate chemicals and laboratory reagents. All of the labpacks located on the fourth floor have been relocated to the second floor staging area. Readings taken with the Bicron Surveyor 2000 radiation meter, on a vial with a hand written label Np (the atomic symbol for Neptunium) did not exceed the ambient background. The vial is kept in a metal container at an isolated location, bordered with caution tape. Two truckloads of roadstone were delivered onsite and

spread out over the remaining open patches of ground. Floodlights were hung outside the second floor of the building facing the Passaic river. The lights are to illuminate the area at night to aid security.

B. On March 15, 1988, the segregation of chemicals and laboratory reagents according to their hazardous properties was completed. The materials remain on the second floor of the building. The following shock sensitive and immediately dangerous material was shipped offsite for incineration (Mercuric Iodide, Ethyl Acetate, Vanadium Pentoxide, Magnesium Perchlorate and Lanthanum Nitrate). Samples were taken from drums containing aluminum, nickel and zinc dust. Two overpack drums containing bags of borax and soda ash were moved from the fourth to the first floor.

3. FINANCIAL STATUS:

A.	Total Project Ceiling Authorized	$ 230,000.
B.	Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 115,000.
C.	Estimate of Total Mitigation Contracts as of 3/15/88	$ 54,500.
D.	Other Estimated Extramural Costs	
	1.a. TAT salary	$ 8,500.
E.	Intramural Estimated Costs	$ 27,000.
F.	Total Expenditures and Percentages of $2,000,000.	(4.5% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. To continue removing shock sensitive and hazardous materials and take other measures to secure and stabilize the site.

B. To prepare an action memorandum for a full funded complete removal action.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP___ FURTHER POLREPS FORTHCOMING X SUBMITTED BY_____

John J. Shaw, OSC
Response and
Prevention Branch

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: March 18, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington, (E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.: Eight (8)
INCIDENT NAME: IMS
SITE/SPILL NO.: 1C
POLLUTANT: Shock sensitive chemicals, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION: Major
SOURCE: Abandoned precious metals recovery facility
LOCATION: Newark, New Jersey
AMOUNT: 450 Laboratory containers, 45 tanks and over 100 drums
WATER BODY: Passaic River

1. SITUATION:

A. Hazardous conditions remain.

B. No PRP has accepted responsibility for site cleanup.

C. EPA continues to pursue an innovative approach to involving a prospective buyer of the property as a PRP.

2. ACTION TAKEN:

A. On March 16, 1988, drums in deteriorating condiction located on the fourth floor, were placed into overpacked containers and moved to a secure area of the building. Potentially flamable material, such as cardboard and paper, was collected throughout the building. Windows on all four floors of the building were secured.

B. On March 17, 1988, air samples were collected on all four floors of the building, as well as upwind and downwind from

bordered

site. The samples will be analyzed for total metals. A cylinder marked sulfur dioxide was discovered on the fourth floor of the building, it was moved to a secure area ~~borders~~ with caution tape. All of the drums and containers throughout the entire building were numbered and their labels and/or markings recorded.

3. FINANCIAL STATUS:

A.	Total Project Ceiling Authorized	$ 230,000.
B.	Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 115,000.
C.	Estimate of Total Mitigation Contracts as of 3/17/88	$ 60,000.
D.	Other Estimated Extramural Costs	
	1.a. TAT salary	$ 9,500.
E.	Intramural Estimated Costs	$ 31,000.
F.	Total Expenditures and Percentages of $2,000,000.	(5.025% of 2M) 5.025

4. FUTURE PLANS AND RECOMMENDATIONS:

A. To continue removing shock sensitive and hazardous materials and take other measures to secure and stabilize the site.

B. To prepare an action memorandum for a full funded complete removal action.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP___ FURTHER POLREPS FORTHCOMING X SUBMITTED BY_____

John J. Shaw, OSC
Response and
Prevention Branch

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: March 23, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington,
(E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Nine (9)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
POLLUTANT:	Shock sensitive chemicals, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	450 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River

1. SITUATION:

A. Hazardous conditions remain.

B. No PRP has accepted responsibility for site cleanup.

C. EPA continues to pursue an innovative approach to involving a prospective buyer of the property as a PRP.

2. ACTION TAKEN:

A. On March 18, 1988, ERC's continued to collect cardboard and paper debris throughout the building. All of the windows were secured, and visqueen was hung over the second floor windows to protect the segregated chemicals and reagents from direct sunlight. Air samples, collected on March 17th, were shipped out for analysis.

B. On March 21, 1988, storage tanks located on all four floors of the building were numbered and checked for liquid

content where possible. None of the tanks that could be checked contained liquid. ERC's continued to collect cardboard and paper debris throughout the building.

C. On March 22, 1988, samples of zinc, nickel and aluminum dust were taken to the Rambach Corp. for analysis. The Rambach Corp. may accept the material. Two cylinders, one containing sulfur dioxide and the other containing acetylene, were taken off site by Union Carbide Linde Division. The windows and doors throughout the entire building were secured and the site demobilized.

3. FINANCIAL STATUS:

A.	Total Project Ceiling Authorized	$ 230,000.
B.	Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 115,000.
C.	Estimate of Expenditures under DCN #KE-0055 as of 3/22/88	$ 76,000.
D.	Other Estimated Extramural Costs	
	1.a. TAT salary	$ 11,000.
E.	Intramural Estimated Costs	$ 35,000.
F.	Total Expenditures and percentages of $2,000,000.	(6.1% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. To continue removing shock sensitive and hazardous materials and take other measures to secure and stabilize the site.

B. To prepare an action memorandum for a full funded complete removal action.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP___ FURTHER POLREPS FORTHCOMING X SUBMITTED BY John J. Shaw

John J. Shaw, OSC
Response and
Prevention Branch

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: March 31, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington, (E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Ten (10)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
POLLUTANT:	Shock sensitive chemicals, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	450 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River

1. SITUATION:

A. Hazardous chemicals and flammable debris remain.

B. No PRP has accepted responsibility for site cleanup.

C. EPA continues to pursue an innovative approach to involving a prospective buyer of the property as a PRP.

D. Security guards are on a 24 hour schedule.

2. ACTION TAKEN:

A. On March 28, 1988, Harvey Rambach of the Rambach Corp. visited the site to inspect the nickel drums. He thought that one of the two drums really contained zinc and refused to accept them. He also said that it wasn't worth taking the zinc.

B. On March 28,30, 1988, ERCS hard wired eight outdoor lights to the building. They will automatically turn on and

off as needed. The lights will increase the security at the site.

C. ERCS is preparing a work plan and cost estimate for doing a complete removal action.

D. Chemicals left include the following major waste streams: acids, bases, flammables, cyanides, combustibles, metals oxidizers, inorganic salts, organics, water reactives, reducers, non-metallic elements, paints and unknowns.

E. Potentially contaminated combustibles such as cardboard and paper debris collected by ERCS remain in the building.

F. Potentially contaminated circuit boards remain in the container box located outside the building.

G. Spent photographic film, containing small amounts of silver and cyanide, remain outside of the building.

H. The TAT has been tasked to find recyclers for the nickel, aluminum and zinc powders.

I. Provided information on chemicals and their location to the Newark Fire Department.

3. FINANCIAL STATUS:

A.	Total Project Ceiling Authorized	$ 230,000.
B.	Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 150,000.
C.	Estimate of Expenditures under DCN #KE-0055 as of 3/30/88	$ 82,000.
D.	Other Estimated Extramural Costs	
	1.a. TAT salary	$ 13,000.
E.	Intramural Estimated Costs	$ 42,000.
F.	Total Expenditures and percentages of $2,000,000.	$ 137,000. (6.8% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. On April 1, 1988, Chem Waste Management will remova 5 MEK peroxide bottles and some of the more hazardous lab chemicals such as cyanides, metals, some oxidizers and some flammables.

B. An action memorandum for a full funded complete removal action is recommended for approval.

C. To continue removing hazardous materials and take other measures to secure and atabilize the site.

D. Continue pursuit of PRP's.

E. Monitor site as needed.

FINAL POLREP____ FURTHER POLREPS FORTHCOMING X SUBMITTED BY

John J. Shaw, OSC
Response and
Prevention Branch

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: April 4, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington, (E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Eleven (11)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
POLLUTANT:	Shock sensitive chemicals, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	450 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River

1. SITUATION:

   A. Hazardous chemicals and flammable debris remain.

   B. No PRP has accepted responsibility for site cleanup.

   C. EPA continues to pursue an innovative approach to involving a prospective buyer of the property as a PRP.

   D. Security guards are on a 24 hour schedule.

2. ACTION TAKEN:

   A. On April 1, 1988, the Chem Waste Company removed 124 containers from the building. The materials (oxidizers, inorganics, metals and shock sensitives) will be incinerated. To date, 148 containers from a total of 1,109, have been removed from the site. The decontamination trailer was demobilized from the site.

   B. On April 5, 1988, members of the Technical Assistance

Team, sampled drums marked Nickel powder and Zinc powder. The samples were packaged and shipped to potential recyclers of the material. EPA continues to pursue recyclers of the aluminum powder still located inside the building.

C. ERCS is preparing a work plan and cost estimate for doing a complete removal action.

D. Chemicals left include the following major waste streams: acids, bases, flammables, cyanides, combustibles, metals oxidizers, inorganic salts, organics, reducers, non-metallic elements, paints and unknowns.

E. Potentially contaminated combustibles such as cardboard and paper debris collected by ERCS remain in the building.

F. Potentially contaminated circuit boards remain in the container box located outside the building.

G. Spent photographic film, containing small amounts of silver and cyanide, remain outside of the building.

H. Updated information on chemicals and their location to the Newark Fire Department.

3. FINANCIAL STATUS:

A.	Total Project Ceiling Authorized	$ 230,000.
B.	Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 150,000.
C.	Estimate of Expenditures under DCN #KE-0055 as of 4/5/88	$ 94,000.
D.	Other Estimated Extramural Costs	
	1.a. TAT salary	$ 14,000.
E.	Intramural Estimated Costs	$ 48,000.
F.	Total Expenditures and percentages of $2,000,000.	$ 156,000. (7.8% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. An action memorandum for a full funded complete removal action is recommended for approval.

B. To continue removing hazardous materials and take other measures to secure and stabilize the site.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP____ FURTHER POLREPS FORTHCOMING X SUBMITTED BY John J. Shaw

John J. Shaw, OSC
Response and
Prevention Branch

DATE RELEASED_____

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: April 13, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington, (E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Twelve (12)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
POLLUTANT:	Shock sensitive chemicals, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	1100 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River

1. SITUATION:

A. Hazardous chemicals and flammable debris remain.

B. No PRP has accepted responsibility for site cleanup.

C. Security guards are on a 24 hour schedule.

2. ACTION TAKEN:

A. On April 12, 1988, the Technical Assistance Team sampled a drum labeled aluminum powder, as well as a drum and pail containing unknown solid material. The sample of Aluminum powder was sent to the manufacturer of the material for analysis. The EPA continues to pursue recyclers interested in the aluminum, nickel and zinc powders.

B. The EPA and TAT continue to pursue possible recyclers of other chemicals still located inside the building.

C. ERCS prepared a draft work plan and cost estimate for doing a complete removal action.

D. A potential buyer of the property (PRP) was notified by site compliance, about the restrictions required by the EPA of anyone buying the property. The EPA is still awaiting a response.

E. A PRP has requested that the EPA define the hazards and threat associated with the site. A response is in the process of being drafted.

3. FINANCIAL STATUS:

A. Total Project Ceiling Authorized	$ 230,000.
B. Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 150,000.
C. Estimate of Expenditures under DCN #KE-0055 as of 4/12/88	$ 96,000.
D. Other Estimated Extramural Costs	
1.a. TAT salary	$ 16,000.
E. Intramural Estimated Costs	$ 49,000.
F. Total Expenditures and percentages of $2,000,000.	$ 161,000. (8.0% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. An action memorandum for a full funded complete removal action is recommended for approval.

B. To continue removing hazardous materials and take other measures to secure and stabilize the site.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP____ FURTHER POLREPS FORTHCOMING X SUBMITTED BY_____

John J. Shaw, OSC
Response and
Prevention Branch

DATE RELEASED_____

Mentzel

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: April 28, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington,
(E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Thirteen (13)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
POLLUTANT:	Shock sensitive chemicals, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	1100 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River

1. SITUATION:

A. Hazardous chemicals and flammable debris remain.

B. No PRP has accepted responsibility for site cleanup.

C. Security guards are on a 24 hour schedule.

2. ACTION TAKEN:

A. On April 21, 1988, two 30 gallon fiber drums containing hydrazine sulfate were overpacked and shipped to the Park Trading Co., Cranston, R.I. for recycling at no additional cost to the EPA. ERCS had estimated that the cost for incineration would have been $80,000.

B. On April 26, 1988, a 55 gallon drum containing atomized aluminum powder was overpacked by ERCS and then shipped to the manufacturer, Alcan Toyo America, Joliet, Il. ERCS had estimated that the cost for incineration would have been $3,400. The freight cost is estimated to be $300.

C. The EPA and TAT continue to pursue possible recyclers of other chemicals still located inside the building.

3. FINANCIAL STATUS:

A.	Total Project Ceiling Authorized	$ 230,000.
B.	Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 150,000.
C.	Estimate of Expenditures under DCN #KE-0055 as of 4/26/88	$ 98,000.
D.	Other Estimated Extramural Costs	
	1.a. TAT salary	$ 17,500.
E.	Intramural Estimated Costs	$ 51,000.
F.	Total Expenditures and percentages of $2,000,000.	$ 166,500. (8.325% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. An action memorandum for a full funded complete removal action is recommended for approval.

B. To continue removing hazardous materials and take other measures to secure and stabilize the site.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP____ FURTHER POLREPS FORTHCOMING X SUBMITTED BY_____

John J. Shaw, OSC
Response and
Prevention Branch

DATE RELEASED John J. Shaw

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: May 6, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington,
(E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Fourteen (14)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
POLLUTANT:	Flammables, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	1100 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River

1. SITUATION:

A. Hazardous chemicals and flammable debris remain.

B. No PRP has accepted responsibility for site cleanup.

2. ACTION TAKEN:

A. On May 2, 1988, two small drums of nickel powder, weighing about 500 pounds, were shipped to the Novamet Co., Wyckoff, New Jersey for recycling at no extra cost for EPA. ERCS had estimated that incineration would cost about $2500.

B. On May 3, 1988, ERCS was mobilized for one day to: fill a 30 foot rolloff with combustible debris to decrease the fire hazard, to disconnect the electricity and phones from the office trailer, and to move some of the laboratory chemicals away from the windows on the second floor, where they were subject to the sun's heat.

C. On May 4, 1988, the rolloff was transported to an industrial landfill, the office trailer was demobilized and the security service terminated.

D. The EPA and TAT continue to pursue possible recyclers of other chemicals still located inside the building.

3. FINANCIAL STATUS:

A. Total Project Ceiling Authorized	$ 230,000.
B. Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 150,000.
C. Estimate of Expenditures under DCN #KE-0055 as of 5/4/88	$ 100,000.
D. Other Estimated Extramural Costs	
1.a. TAT salary	$ 21,000.
E. Intramural Estimated Costs	$ 52,000.
F. Total Expenditures and percentages of $2,000,000.	$ 173,000. (8.65% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. An action memorandum for a full funded complete removal action is recommended for approval.

B. To continue removing hazardous materials and take other measures to secure and stabilize the site.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP____ FURTHER POLREPS FORTHCOMING X SUBMITTED BY John J. Shaw

John J. Shaw, OSC
Response and
Prevention Branch

DATE RELEASED May 9, 1988

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: May 23, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington,
(E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Fifteen (15)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
POLLUTANT:	Flammables, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	1100 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River

1. SITUATION:

A. Hazardous chemicals and flammable debris remain.

B. No PRP has accepted responsibility for site cleanup.

2. ACTION TAKEN:

A. EPA and/or TAT will visit the site periodically to assure that the building is secure.

B. Fine Pigments, a former manufacturing facility located to the south of IMS, has installed an 8 foot high fence topped with barbed wire.

C. The EPA and TAT continue to pursue possible recyclers of other chemicals still located inside the building.

3. FINANCIAL STATUS:

A. Total Project Ceiling Authorized $ 230,000.

B.	Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 150,000.
C.	Estimate of Expenditures under DCN #KE-0055 as of 5/18/88	$ 100,000.
D.	Other Estimated Extramural Costs	
	1.a. TAT salary	$ 23,000.
E.	Intramural Estimated Costs	$ 52,500.
F.	Total Expenditures and percentages of $2,000,000.	$ 175,500. (8.75% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. An action memorandum for a full funded complete removal action is recommended for approval.

B. To continue removing hazardous materials and take other measures to secure and stabilize the site.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP____ FURTHER POLREPS FORTHCOMING X SUBMITTED BY John J. Shaw

John J. Shaw, OSC
Response and
Prevention Branch

DATE RELEASED May 23, 1988

Tiggs

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: May 24, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington, (E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Sixteen (16)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
POLLUTANT:	Flammables, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	1100 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River

1. SITUATION:

A. Hazardous chemicals and flammable debris remain.

B. No PRP has accepted responsibility for site cleanup.

2. ACTION TAKEN:

A. EPA and/or TAT will visit the site periodically to assure that the building is secure.

B. Four 5 gallons pails containing 99.6% foam liquid were picked up by the Newark Fire Department who will use the material during training exercises.

C. The EPA and TAT continue to pursue possible recyclers of other chemicals still located inside the building.

3. FINANCIAL STATUS:

A. Total Project Ceiling Authorized $ 230,000.

B.	Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 150,000.
C.	Estimate of Expenditures under DCN #KE-0055 as of 5/25/88	$ 100,500.
D.	Other Estimated Extramural Costs	
	1.a. TAT salary	$ 24,000.
E.	Intramural Estimated Costs	$ 54,000.
F.	Total Expenditures and percentages of $2,000,000.	$ 178,500. (8.92% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. An action memorandum for a full funded complete removal action is recommended for approval.

B. To continue removing hazardous materials and take other measures to secure and stabilize the site.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP____ FURTHER POLREPS FORTHCOMING X SUBMITTED BY John J. Shaw

John J. Shaw, OSC
Response and
Prevention Branch

DATE RELEASED 5/25/88

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: June 7, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington,
(E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Seventeen (17)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
POLLUTANT:	Flammables, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	1100 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River

1. SITUATION:

A. Hazardous chemicals and flammable debris remain.

B. No PRP has accepted responsibility for site cleanup.

2. ACTION TAKEN:

A. EPA and/or TAT will visit the site periodically to assure that the building is secure.

B. Planning for the lab packing portion of the first phase is nearing completion.

C. The EPA and TAT continue to pursue possible recyclers of other chemicals still located inside the building.

3. FINANCIAL STATUS:

A.	Total Project Ceiling Authorized	$ 230,000.
B.	Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 150,000.
C.	Estimate of Expenditures under DCN #KE-0055 as of 6/6/88	$ 101,000.
D.	Other Estimated Extramural Costs	
	1.a. TAT salary	$ 25,000.
E.	Intramural Estimated Costs	$ 54,000.
F.	Total Expenditures and percentages of $2,000,000.	$ 180,000. (9.0% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. An action memorandum for a full funded complete removal action is recommended for approval.

B. To continue removing hazardous materials and take other measures to secure and stabilize the site.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP____ FURTHER POLREPS FORTHCOMING X SUBMITTED BY John J. Shaw

John J. Shaw, OSC
Response and
Prevention Branch

DATE RELEASED 6/7/88

Tuggo

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: June 22, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington,
(E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Eighteen (18)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
NPL STATUS:	Non-NPL
POLLUTANT:	Flammables, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	1100 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River
DELIVERY ORDER NO:	7445 - 02 - 032
DELIVERY ORDER NO.:	7445-02-032

1. SITUATION:

A. Hazardous chemicals and flammable debris remain.

B. No PRP has accepted responsibility for site cleanup.

2. ACTION TAKEN:

A. Samples of zinc powder were taken and sent to a potential recycler.

B. On June 21, 1988 - EPA requested that ERC's discontinue the electricity and phone service to the site.

C. A request for a $20,000 increase in the ceiling was sent to New York on June 22, 1988. The increase will enable EPA and TAT to continue recycling efforts to complete the site assessment and action memorandum.

3. FINANCIAL STATUS:

A.	Total Project Ceiling Authorized	$ 230,000.
B.	Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 150,000.
C.	Estimate of Expenditures under DCN #KE-0055 as of 6/21/88	$ 96,000.
D.	Other Estimated Extramural Costs	
	1.a. TAT salary	$ 49,000.
E.	Intramural Estimated Costs	$ 79,000.
F.	Total Expenditures and percentages of $2,000,000.	$ 224,000. (11.2% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. An action memorandum for a full funded complete removal action is recommended for approval.

B. To continue recycling hazardous materials.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP____ FURTHER POLREPS FORTHCOMING X SUBMITTED BY John J. Shaw

John J. Shaw, OSC
Response and
Prevention Branch

DATE RELEASED_____

Trips

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: July 7, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington,
(E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Nineteen (19)
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
NPL STATUS:	Non-NPL
POLLUTANT:	Flammables, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	1100 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River
DELIVERY ORDER NO:	7445 - 02 - 032
DELIVERY ORDER NO.:	7445-02-032

1. SITUATION:

A. Hazardous chemicals and flammable debris remain.

B. No PRP has accepted responsibility for site cleanup.

2. ACTION TAKEN:

A. On June 21, 1988 - EPA requested that ERC's discontinue the electricity and phone service to the site.

B. A request for a $20,000 increase in the ceiling was sent to New York on June 22, 1988. The increase will enable EPA and TAT to continue recycling efforts to complete the site assessment and action memorandum.

3. FINANCIAL STATUS:

A.	Total Project Ceiling Authorized	$ 230,000.
B.	Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 150,000.
C.	Estimate of Expenditures under DCN #KE-0055 as of 7/7/88	$ 96,000.
D.	Other Estimated Extramural Costs	
	1.a. TAT salary	$ 49,000.
E.	Intramural Estimated Costs	$ 79,000.
F.	Total Expenditures and percentages of $2,000,000.	$ 224,000. (11.2% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. An action memorandum for a full funded complete removal action is recommended for approval.

B. To continue recycling hazardous materials.

C. Continue pursuit of PRP's.

D. Monitor site as needed.

FINAL POLREP____ FURTHER POLREPS FORTHCOMING X SUBMITTED BY John J. Shaw

John J. Shaw, OSC
Response and
Prevention Branch

DATE RELEASED July 11, 1988

Trapp

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: July 14, 1988

Region II
Response and Prevention Branch
Edison, New Jersey 08837

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

TO: C. Daggett, EPA
S. Luftig, EPA
R. Salkie, EPA
G. Zachos, EPA
J. Marshall, EPA
B. Sprague, EPA
ERD, Washington,
(E-Mail)
J. Czapor, EPA
J. Trela, NJDEP
A. Cavalier, NJDEP
A. Zach, City/Newark
D. Beeman, NJDEP
TAT

POLREP NO.:	Twenty (20) and Final
INCIDENT NAME:	IMS
SITE/SPILL NO.:	1C
NPL STATUS:	Non-NPL
POLLUTANT:	Flammables, cyanides, acids, bases, hydrazines, heavy metals
CLASSIFICATION:	Major
SOURCE:	Abandoned precious metals recovery facility
LOCATION:	Newark, New Jersey
AMOUNT:	1100 Laboratory containers, 45 tanks and over 100 drums
WATER BODY:	Passaic River
DELIVERY ORDER NO:	7445 - 02 - 032

1. SITUATION:

A. Hazardous chemicals, stong acids, flammables, conbustibles, unknowns and debris remain.

B. No PRP has accepted responsibility for site cleanup.

2. ACTION TAKEN:

A. On June 21, 1988 - EPA requested that ERC's discontinue the electricity and phone service to the site. The expedited removal action was considered closed on July 11, 1988.

B. A request for a $20,000 increase in the ceiling was sent to New York on June 22, 1988. The increase will enable EPA and TAT to complete the site assessment and action memorandum.

C. As a result of a shortage of regional funds, work under the expedited action memo was halted on July 11, 1988 when ERCS was requested to end electric and telephone service to the site. The objectives of the expedited action memo were basically achieved: removal of the known most hazardous chemicals including shock sensitive material, seperation of known incompatible materials, recycling of extremely hazardous substances, overpacking some of the hazardous chemicals which were in deteriorating containers, and securing of the building thus reducing the threat of fire/explosion and of direct contact. During the operations at IMS, 154 laboratory reagents were removed. Two drums of hydrazine sulfate, 1 drum of aluminum powder, 2 drums of nickel powder, one cylinder of acetylene and one cylinder of sulfur dioxide were recycled. One 20 yard rolloff of ignitable debris was disposed of as an industrial waste. To facilitate the removal, mechanical hazards and debris were relocated on site or collected.

3. FINANCIAL STATUS:

A.	Total Project Ceiling Authorized	$ 230,000.
B.	Mitigation Contract Funds Authorized and Obligated by DCN #KE-0055	$ 150,000.
C.	Estimate of Expenditures under DCN #KE-0055 as of 7/14/88	$ 98,000.
D.	Other Estimated Extramural Costs	
	1.a. TAT salary	$ 49,000.
E.	Intramural Estimated Costs	$ 80,000.
F.	Total Expenditures and percentages of $2,000,000.	$ 227,000. (11.35% of 2M)

4. FUTURE PLANS AND RECOMMENDATIONS:

A. An action memorandum for a full funded complete removal action is recommended for approval.

B. Continue pursuit of PRP's.

C. Monitor site as needed.

FINAL POLREP X FURTHER POLREPS FORTHCOMING ___ SUBMITTED BY John J. Shaw

John J. Shaw, OSC
Response and
Prevention Branch

DATE RELEASED 7/16/88

ATTACH TO LETTER OF CHEETHAM, 8/20/87

JULY 29, 1987

CITY OF NEWARK
NEWARK, N.J. 07102

ATTN: [illegible]

AS PER YOUR REQUEST PLEASE NOTE THE FOLLOWING SUMMARY OF PLAN FOR BLANCHARD STREET SITE:

I. PROJECT DIRECTOR [illegible] THE PREVIOUS VIEW EXPERIENCE AT [illegible]

II. ENVIRONMENTAL PLANNERS:
A. DEPT OF [illegible], CITY OF NEWARK

B. DANIEL HUTTO, DIRECTOR OF TOXIC AND HAZARDOUS WASTE CENTER AT NJIT. SEE LETTER FROM HIM REGARDING SHOWCASE SITE CLEAN UP.

C. DAVID JEDYNAK, DEPARTMENT OF ENVIRONMENT & PROTECTION ENFORCEMENT, WAS ASKED TENTATIVELY TO ASSIST US IN THE CONTEXT OF [illegible] OF THE HAZARDOUS CHEMICALS.

III. SPECIFIC LOCATIONS AND WASTE:

186 BLANCHARD: [illegible] METALLURGY INC.

170 BLANCHARD: [illegible]

IV. PRELIMINARY EVALUATION AND SURVEY:

A. FOLLOWING FORECLOSURE BY THE CITY OF NEWARK FOR 194 BLANCHARD ST. WE WILL TAKE PHOTOGRAPHS OF THE INSIDE AND OUTSIDE OF THE BUILDING AND INCLUDE AN INVENTORY OF ALL HAZARDOUS CHEMICALS AND GASES.

B. EVALUATION OF THE EXTENT OF GROUND WATER CONTAMINATION USING TWO MONITORING WELLS ON EITHER SIDE OF THE BUILDING. SAMPLES OF THE GROUND WATER WILL BE ANALYZED BY A STATE APPROVED LABORATORY USING ATOMIC SPECTROMETERS TO EVALUATE BY TCLP AND PRIORITY POLLUTANTS ANALYSIS. AT LEAST FOUR SOIL SAMPLES SURROUNDING THE PROPERTY WILL ALSO BE TAKEN AND ANALYZED IN THE SAME MANNER. AT SETTLEMENT OF ADMINISTRATIVE CONSENT ORDER THE CITY WILL BE ABLE TO OBTAIN ANY AMBIENT GROUND WATER CONTAMINATION.

C. ANY SOIL TAINTED WITH HAZARDOUS WASTE CONTAMINATION WILL BE EXCAVATED AND DISPOSED OF IN COMPLIANCE WITH THE FEDERAL REGULATIONS GOVERNING TRANSPORT AND PACKAGING.

D. SAMPLING WILL BE PERFORMED BY LASER PRODUCTS CORPORATION UNDER THE SUPERVISION OF CITY ENGINEERS AND COMPLIANCE WITH STATE GUIDELINES.

V. HAZARDOUS CHEMICAL REMEDIATION AND DISPOSAL:

UNDER THE REVIEW OF THE CITY ENGINEERS THE HAZARDOUS CHEMICALS INSIDE THE BUILDING WILL BE SEPARATED FROM NON HAZARDOUS CHEMICALS AND PACKAGED IN DOT APPROVED LAB PACKS FOR ULTIMATE DISPOSAL TO A HAZARDOUS WASTE LANDFILL. PACKAGING OF THE LAB PACKS WILL BE PERFORMED IN COMPLIANCE WITH FEDERAL REGISTER VOL 52 NO 94. ALL CHEMICAL CLEAN UP, SAMPLING, AND PACKAGING WILL BE PERFORMED BY EXPERIENCED PERSONNEL IN POSITIVE PRESSURE FULL FACE MASK BREATHING APPARTUS. FULL CHEMICAL SPLASH SUITS AND HOOD WILL USED TO MAXIMIZE PROTECTION OF ALL PERSONNEL. ADDITIONAL BREATHING APPARTUSES AND CHEMICAL SUITS WILL BE AVAILABLE FOR NEWARK ENGINEERS WISHING TO ENTER THE BUILDINGS UNDERGOING CLEAN UPS. UPON ENTERING THE BUILDINGS, A CLEAN AREA WILL BE ESTABLISHED AND A SUBSEQUENT DECONTAMINATION AREA UNDER NEGATIVE PRESSURE WILL ALSO BE CONSTRUCTED BEFORE CLEAN UP BEGINS. AFTER CLEAN UP CREWS ARE FINISHED FOR THE DAY OR NEED TO TAKE BREAKS THEY WILL BE REQUIRED TO DECONTAMINATE IN THE SHOWER ROOM BEFORE REMOVING SUITS AND AFTER REMOVING SUITS TO PREVENT SPREADING CONTAMINATION TO THE OUTSIDE.

DURING THE CLEAN UP OPERATION ONE INDIVIDUAL WILL BE AVAILABLE AT ALL TIMES TO MONITOR THE CLEAN UP AND COVER CLEAN UP PERSONNEL WITH CHEMICAL FIRE EXTINGUISHER. ADDITIONAL PERSONNEL WILL BE AVAILABLE ALSO TO PROVIDE HIGH PRESSURE WATER FROM A WATER JET IN THE EVENT OF ACCIDENTAL CONTAMINATION. VARIOUS CLEAN UP EQUIPMENT AND NEUTRALIZING CHEMICALS WILL ALSO BE AVAILABLE TO NEUTRALIZE ANY CHEMICALS SPILLED ON THE FLOOR.

AIR MONITORING EQUIPMENT WILL BE USED DURING THE ENTIRE CLEAN UP PROCESS TO TEST FOR EXPLOSIVITY AND REACTIVITY DURING AND AFTER THE CLEAN UP PROCESS. THE AIR WILL BE CONTINUOUSLY MONITORED TO MEASURE THERE ARE NO SIGNIFICANT AIR EMMISIONS DURING THE CLEAN UP PROCESS.

THIS DATA WILL BECOME PART OF A COMPUTER RECORD THAT WILL BE MADE AVAILABLE TO NJIT, DEP, AND CITY ENGINEERS.

ON GOING CONTINUOUS INSTRUCTION WILL BE PROVIDED TO ALL PERSONNEL THAT ARE INVOLVED IN THE CLEAN UP PROCESS. RECORDS OF THESE INSTRUCTIONAL SEMINARS WILL ALSO BE MADE AVAILABLE FOR INSPECTORS. RECORDS OF PRE AND POST MONITORING OF BLOOD AND URINE CHEMISTRY WILL ALSO BE PERFORMED ON ALL PERSONNEL INVOLVED IN THE CLEAN UP PROCESS. THESE RECORDS WILL ALSO BE MADE AVAILABLE.

VI. THERE ARE APPROX. 47 STEEL TANKS RANGING FROM 5 -20,000 GALLON CAPACITY. THESE TANKS ARE LOCATED AT 196 BLANCHARD STREET AND ARE PRESENTLY EMPTY. WE WILL CUT THESE TANKS WITH A MECHANICAL PLASMA ARC UNIT OR A-A. THIS TECHNOLOGY WILL ALLOW THE RAPID CUTTING AND EVENTUAL REMOVAL OF THE SCRAP STEEL TO BE SHIPPED TO A RECYCLING CENTER. TO CUT AWAY THE STEEL SUPPORTS HOLDING UP THE TANKS WE WILL BE USING A PLASMA TORCH.

VII. ALL TRANSFORMERS WILL BE DRAINED FOR PCB'S AND DRAINED AND DISPOSED OF IN ACCORDANCE WITH STATE AND FEDERAL REGULATIONS. EVERY PIECE OF EQUIPMENT TO BE DECONTAMINATED WILL BE TREATED AS HAZARDOUS WASTE AND SHIPPED TO A HAZARDOUS LANDFILL FOR DISPOSAL. PCB CONTAMINATED SOIL WOULD ALSO BE PACKAGED AND SHIPPED IN SIMILAR MANNERS.

VIII. ALL NON HAZARDOUS MATERIALS WILL BE EITHER SOLD AS COMMODITIES OR SHIPPED TO AN INDUSTRIAL LANDFILL.

IX. UPON COMPLETION OF THE CLEAN UP OF THE PROPERTY AN INDUSTRIAL HYGIENIST WILL INSPECT, TAKE SAMPLES AND PROVIDE CERTIFICATION OF PROPER CLEAN UP, INDICATING THE PROPERTY IS READY FOR OCCUPANCY.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 15 1988

Mr. Alvin L. Zach, Director
Department of Engineering
420 Broad Street
Newark New Jersey 07102

Re: International Metallurgical Services

Dear Mr. Zach

I am writing in response to your letter dated May 6, 1988, concerning the above-referenced site ("IMS" or "the site").

As you are aware, the Environmental Protection Agency (EPA) is conducting a removal action at IMS. To date, EPA has numbered fifty one tanks on the premises and verified that twenty three are empty. The remaining tanks will be opened and inspected at a later date.

As for your concern regarding the disposal costs of the hydrazine sulfate, the total disposal cost to incinerate 800 one-pound packages of hydrazine sulfate was orginally estimated at $80,000. However, EPA's contractor subsequently received a price for complete disposal of $5,000 from another waste disposal facility.

As mentioned in your letter, Fairmount Chemicals of Blanchard Street produces hydrazine sulfate and may therefore, have been interested in receiving the chemical. EPA provided a list of chemicals at the site (including laboratory reagents) to Fairmount. However, Fairmount declined to accept any material from IMS.

The On-Scene-Coordinator attempted to recycle the aluminum powder in Newark after Harvey Rambach, President of the Rambach Company, expressed interest in the aluminum, nickel and zinc powders. However, after EPA expended considerable time and effort negotiating with Mr. Rambach, he decided against taking the powders. Consequently, the aluminum and nickel powders were sent to their original manufacturers for recycling. EPA is attempting to locate a facility to dispose of the zinc powder.

REGION II:ERRD:JS:lgs:6/27/88	CONCURRENCES						
SYMBOL	NNYCS	RP	ORC	NNJCS	SCB		
	SCHMIDTBERGER	SHAW	McVEIGH	[illegible]	OZAPOR		
	6/28	7/1	7/1	7/1	7/15/88		

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

JUL 15 1987

I appreciate your comments and your offer to assist EPA with our work at IMS. If you have questions, do not hesitate to contact James Schmidtberger, of my staff, at (212) 264-2646.

Sincerely yours,

John V. Czapor, Chief
Site Compliance Branch

Newark

Sharpe James
Mayor

cc: Marshall
Luftig/Action

Department of Engineering

920 Broad Street,
Newark, New Jersey 07102
(201) 733-8520

Alvin L. Zach P.E., L.S.
Director

Response due
9/6/88
Jim's reply

August 11, 1988

JIM S.
F.Y.I.
John L.

William J. Muszynski, P.E.
Acting Regional Administrator
U.S.E.P.A., Region II
26 Federal Plaza
New York, N.Y. 10278

Dear Mr. Muszynski:

I was quite please to hear that your agency will be back in Newark the week of August 15 to complete the remediation of the Arkansas Chemical Site at 185 Foundry Street.

I would like to bring to your attention a site at 196 Blanchard Street, the International Metallurgical site. Pursuant to conversations with U.S.E.P.A. headquarters in Washington, I noted several areas in need of clarification in relation to U.S.E.P.A. cleanups of superfund sites. I was informed that any cleanup of a superfund site must have a forum for public participation. Also I was apprised that in order for U.S.E.P.A. to assure control of a site, that site must be listed on the National Priorities List. I would suggest, that to my knowledge, the I.M.S. site does not meet this criteria.

One other factor about the I.M.S. site is that a private party, Jason Workman of Style VI in Newark, had offered to clean all chemicals out ot the building over 16 months ago. I understand that his negotiations with U.S.E.P.A. have been inconclusive. It is now over one year after the date Mr. Workman would have remediated the site, including compliance with New Jersey E.C.R.A. statutes for the grounds. I would add that this would all have been accomplished without the expenditure of public funds. Additionally, Mr. Workman had several companies interested in opening businesses on the property which would have provided both employment opportunities for local residents as well as returning the site to the local tax rolls.

I would therefore suggest to you that a private cleanup in this situation would be in the public interest and that you allow Mr. Workman to go ahead with his plan without further delay.

Thanking you in advance for your anticipated cooperation, I remain

Very truly yours,

Alvin L. Zach, P.E., L.S., Director
Department of Engineering

ALZ:PB:cmk

cc: Sharpe James, Mayor
Glenn Grant, Corporation Counsel
The Honorable Frank Lautenburg, Senator
The Honorable James Florio, Representative
Jason Workman, Style VI
Chris Dagget, Commissioner, N.J.D.E.P.

APR 07 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jason Workman
Style VI
140 Rome Street
Newark, New Jersey 07105

Re: International Metallurgical Services Site
196 Blanchard Street, Newark, New Jersey

Dear Mr. Workman:

This letter is a response to your request to perform removal activities at the International Metallurgical Services Site ("site") in Newark, New Jersey.

The U.S. Environmental Protection Agency ("EPA") has determined the site is contaminated with hazardous substances as defined in the Comprehensive Environmental Response, Compensation, and Liability Act as amended by the Superfund Amendments and Reauthorization Act of 1986 ("CERCLA"). EPA has implemented an initial CERCLA removal action to reduce the immediate threat of fire, explosion and direct contact with the hazardous substances. In general, EPA welcomes the opportunity for private party cleanup actions at hazardous waste sites. However, EPA's discretion to permit such activities is premised on the technical and financial abilities of a party to perform satisfactorily and EPA's belief that a party is making an informed decision with the aid of legal counsel familiar with applicable federal and state regulatory requirements.

Presently, the owner of the property, International Metallurgical Services ("IMS"), is proceeding with involuntary bankruptcy. The trustee in bankruptcy responsible for liquidation of IMS assets informed me that the building and real property that comprise the site remain assets in the bankruptcy proceeding. The City of Newark has an outstanding lien on the site for delinquent real property taxes. Apparently, Newark has not foreclosed on the lien because of a reluctance to incur the costs associated with decontamination. In your letter of November 16, 1987 to EPA you expressed a desire to clean the site but stated that you must aquire legal title to the site prior to execution of an agreement with EPA. In addition, your technical advisor Eric Cheetham of Laser Products Corporation

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stated in a letter of December 16, 1987 to EPA that you would not assume responsibility for subsurface decontamination. In light of these conditions, EPA takes the following position with respect to your offer to clean the site.

If you take legal title to the site, you will be an "owner" of a facility where hazardous substances were generated, stored and disposed as that term is defined under Section 101 (20)(A) of the CERCLA. Section 107 of CERCLA imposes liability on the owner of a facility where there is a release or a threatened release of a hazardous substance which causes the incurrence of response costs. An owner is liable for, including but not limited to, all costs of removal and remedial actions at the facility. Therefore, upon taking legal title to the property, you would assume strict statutory liability for any and all past, present and future response costs expended by the federal government at the site.

Section 122 (f) of CERCLA permits EPA to provide a covenant not to sue concerning any liability to the United States under CERCLA resulting from a release or threatened release of a hazardous substance addressed by a remedial action under which the party enters into a consent decree for response to a release or threatened release. The language of CERCLA limits the issuance of the convenant not to sue where remedial action is performed by a party. Remedial action means those actions consistent with a permanent remedy taken instead of or in addition to removal actions (Section 101(24) of CERCLA).

It is our understanding from your correspondence that you do not intend to perform a full soil and groundwater remediation but rather you would limit your activites to the removal of hazardous substances, contaminants and pollutants from the building and remediation of the top two inches of soil. These limited removal activites would not meet the requirements of the statute which requires implementation of permanent remedies in return for a convenant not to sue.

EPA began a CERCLA financed removal action at the site on March 7, 1988. The purpose of these activities is to reduce the threat of fire, explosion and direct contact with hazardous substances. The action will include: the removal and disposal of shock sensitive chemicals and explosives; overpacking some hazardous chemicals presently stored in deteriorating containers; separating known incompatible materials; and securing the building. EPA plans to perform a more extensive removal action in October, 1988.

Although the scope of EPA activities is presently limited to an expedited removal action followed by a more complete removal in October, it is possible that the site could be nominated to the National Priorities List (NPL). The NPL identifies the target sites for remedial action under CERCLA. Remedial action would entail further site actions including soil or groundwater cleanup activities deemed necessary under the National Contingency Plan. If you perform the planned October removal action and additional remedial work is required at some time in the future, as an owner, you would be strictly liable for all such costs.

In addition, any agreement entered into with EPA would not affect requirements of the State of New Jersey for clean-up and transfer of the property under the applicable state statutes.

You may take possession of the property and fund a removal action in light of the inability of EPA to provide a covenant not to sue. However, to ensure that the removal action is executed properly and in a timely manner in conformance with the National Contingency Plan (NCP), EPA requires before entering into an Administrative Order, the submittal of a detailed Work Plan. The detailed Work Plan should include, at minimum, the following:

1. Health and Safety Plan
2. Sampling Plan
3. Off-Site Disposal Plan

Each of the above required items are discussed below.

Health and Safety Plan (HSP)

The purpose of the HSP is to provide the framework for the safe conduct of the response actions to be taken at IMS. It will provide guidance for all contractors, sub-contractors and employees, including EPA employees, who will be involved in this project. The HSP should discuss and outline, at minimum, the following:

1. Team Organization
2. Medical Surveillance
3. Employee Training and Work Practices
4. Personnel Protection
5. Work Zone Delineation and Site Control
6. Decontamination Procedures
7. Sanitation
8. Record Keeping
9. Emergency Procedures and Information
10. First Aid and Worker Injury Contingency Plans
11. Explosion and Fire Contingency Plans.

Sampling Plan:

The sampling plan is required to provide representative environmental samples of the existing site conditions. All samples must be transported and analyzed in a reliable and consistent manner. The sampling plan should include, at minimum, the following:

1. Contractor Mobilization
2. Establishment of a Command Post
3. Sampling Procedures
4. Analytical Requirements

In order to ensure environmental monitoring is of known quality, EPA requires the contractor to address under the Sampling Procedures and Analytical Requirements all sampling procedures (i.e. drum sampling, wipe sampling, waste characterizations, etc.) which will be undertaken, provisions for field and trip blank samples, field instrument calibration, chain-of-custody reports, sample vessel decontamination, preservation and holding times of samples, data validation, and technical system audits.

Much of the analytical work in the region is performed by the EPA Contract Lab Program (CLP). CLP provides standardized and specialized analytical services to support Superfund activities and provides legally-defensible analytical results. Therefore, a high level of quality assurance and documentation is incorporated in all aspects of program activities. Your laboratory is not required to participate in the CLP program; however, non-CLP laboratories must submit as part of the Work Plan a Quality Assurance and Quality Control manual which is applicable to the analyses to be perfomed. The laboratory will be sent performance samples for those parameters applicable to the project analyzed. The lab must perform acceptably on these samples. In addition, the primary contractor must perform a technical systems audit in order to evaluate the laboratory's capability to perform the work. Be advised, there should be provisions in the sampling plan for split site samples to be collected by EPA for the purpose of montoring the results of the contracted laboratory analysis.

Disposal Plan:

Since the response actions include removing hazardous wastes and/or hazardous substances from the site, EPA requires a disposal plan. The purpose of this plan is to ensure compliance with EPA's off-site disposal policy, and in particular, to help prevent wastes from contributing to present or future environmental problems by directing these wastes to facilities which have been determined to be at this time environmentally sound. The policy incorporates all mandates of CERCLA, as amended by SARA and describes the procedures which should be followed under CERCLA.

Specifically, the receiving facility must be RCRA permitted and in compliance with all applicable regulations. Wastes cannot be disposed of at non-permitted facilities or facilities found to be in violation with RCRA or other laws. It is the contractor's and thus your responsibility to ensure that the hazardous waste is delivered to authorized facilities. The facility to which you intend to dispose of the hazardous waste must provide in the plan at the time of submittal a letter of intent to accept the hazardous waste from the site as well as proof that it is presently permitted and in compliance.

EPA will review and provide comments on the Work Plan and will require resubmittal of the draft plan with all comments addressed. After the Work Plan has undergone revisions and is approved, EPA will negotiate the terms of the Administrative Order.

In addition to the Work Plan requirements outlined above, EPA may require assurance of your commitment to the completion of this removal in the form of a letter of credit. In the event that you are unable to perform all aspects of the project, this fund could be drawn upon to complete the removal activities. As you are aware, the total cost of the proposed removal action, and thus the anticipated value of the letter of credit, is approximately one million dollars.

You may volunteer to undertake the removal action in EPA's stead by responding unequivocally in writing by the close of business on April 25, 1988 that you understand the terms of this letter and that you are aware of the deliverables and administrative procedures for proper oversight of the project by EPA. Your positive response will assure EPA that you have full knowledge of the scope of this project and the Federal statutes. Send your response to the address below:

U.S. Environmental Protection Agency
Site Compliance Branch - Room 747
26 Federal Plaza
New York, New York 10278
Attn: James Schmidtberger

with a copy to:

Joseph McVeigh, Esq.
Assistant Regional Counsel
Office of Regional Counsel - Room 437

at the same address.

If you wish to discuss this matter in further detail, please contact James Schmidtberger, of my staff, at (212) 264-2646 or Joseph McVeigh, Esq., at (212) 264-3350.

Sincerely yours,

John V. Czapor, Chief
Site Compliance Branch

cc: Eric Cheetham
Laser Products Corporation
RD2 Box 360A
Cogan Station, PA 17728

bcc: D. Karlen, ORC
J. McVeigh, ORC-NJSUP
J. Shaw, ERR-RP
J. Witkowski, ERR-RP
D. Beeman, NJDEP

prepare a response w/ RPB acknowledging validity & position JK

Newark

Sharpe James
Mayor

Department of Engineering

920 Broad Street
Newark, New Jersey 07102
210 733-8520

Alvin L. Zach, P.E; L.S.
Director

May 6, 1988

Mr. John Czapor, Chief
Site Compliance Branch
U.S.E.P.A. Region II
26 Federal Plaza
New York City, N.Y. 10278

Dear Mr. Czapor:

I read John Shaw's Pollution Report dated April 28, 1988, for the IMS site, with great interest. I would like to point out that although there are 45 tanks on the premises, all but two are empty and those two appear to only have rainwater content.

The other issue I would like to address is the "recycling" of the hydrazine sulfate and aluminum powder. I find it incredible that the incineration costs for hydrazine sulfate would be $80,000.00 for 60 gallons. Was this a misprint? I would also like to commend U.S. Environmental Protection Agency in their efforts to recycle chemicals before a disposition is made as to disposal.

I would point out that hydrazine sulfate is manufactured at Fairmount Chemicals on Blanchard Street and they probably could have received it from John Shaw. I would also point out that aluminum powder could also have been recycled here in Newark at Alumet on Frelinhuysen Avenue.

I would appreciate your OSC'S in this area attempting to recycle chemicals, try local sources first. This would save a great deal in transportation costs as well as enabling U.S. Environmental Protection Agency to clean up more sites by any such savings.

I would be amenable to having my staff assist you in any way possible to minimize the costs of cleanups in Newark by utilizing local recyclers.

Please do not hesitate to contact me on this or any other issue of concern.

Very truly yours,

Alvin L. Zach, P.E., Director
Department of Engineering

ALZ:PB:lds

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Alvin L. Zach, P.E., L.S., Director
Department of Engineering
City of Newark
920 Broad Street
Newark, New Jersey 07102

Dear Mr. Zach:

I have been requested to respond to your letter of August 11, 1988 addressed to the Acting Regional Administrator, William J. Muszynski concerning the International Metallurgical Services Site (IMS) at 196 Blanchard Street in Newark. Your letter noted that a private party had offered to remediate the IMS site and you requested that a private party cleanup be allowed to promptly proceed.

At the present time, there is a request before the Acting Regional Administrator for additional funding to complete the Removal Action. During this phase of the cleanup, the remaining containerized chemicals will be removed and sent for proper disposal. This cleanup will not address any sub-surface contamination. The sub-surface contamination will be referred to the New Jersey Department of Environmental Protection (DEP) for possible remedial action and the State of New Jersey's Environmental Cleanup and Responsibility Act (ECRA) clearance.

In general, the Environmental Protection Agency (EPA) welcomes the opportunity for private party cleanup actions at hazardous waste sites. However, EPA's discretion to permit such activities is premised on the technical and financial abilities of the interested party to perform satisfactorily as well as EPA's belief that the interested party is making an informed decision with the aid of legal counsel familiar with the applicable federal and state regulatory requirements.

Mr. Jason Workman expressed interest in performing the planned removal activites for the IMS site. In a letter, dated November 13, 1987, EPA provided Mr. Workman a list of proposed tasks for the removal action and informed him that he would be required to submit a detailed work plan. On December 10, 1987, EPA provided Mr. Workman's consultant with copies of two work plans to assist Mr. Workman in preparing his site-specific plan. On February 5, 1988, EPA met with Mr. Workman's consultant to discuss the site remediation. Mr. Workman did not attend. At the meeting, EPA again explained that Mr. Workman

File:International Metallurgical Services
2ERR-RP:Shaw:906-6827:ehr:JJS#1:9/1/88

ERR-RP	ERR-RP	ERR-RPO	ERR
~~SHAW~~	~~ZACHOS~~	~~SALKIE~~	~~LUFTIG~~
JJShaw 9/06/88	B.H. Zachos 9/06/88	M.H. Salkie 9/06/88	

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would be required to submit a detailed work plan under an administrative consent order and that the project must be performed in accordance with EPA's disposal policy. At that meeting, Mr. Workman's consultant questioned whether performing this federal cleanup would exempt him from RCRA. He was informed that RCRA is a New Jersey law but EPA would inform DEP that the removal was complete upon Mr. Workman's satisfactorily implementing the terms of the removal consent order. However, EPA cannot preclude DEP from performing or requiring Mr. Workman to perform other remedial activities under RCRA. Finally, after expending considerable effort in negotiating with Mr. Workman, in a letter dated April 7, 1988, EPA outlined its requirements regarding his participation in the removal and requested that Mr. Workman respond in writing by April 25, 1988. To date, EPA has not received a formal written response and therefore has assumed that Mr. Workman does not wish to participate in the removal activities.

In your letter, you expressed concern regarding EPA's control of the site. Although IMS is not on the National Priorities List, on June 1, 1987, the NJDEP requested EPA's assistance in removing the hazardous substances from IMS. EPA is authorized to respond to the release (or threat of release) of hazardous substances, contaminants or pollutants into the environment for the purpose of removing the threat.

The EPA has kept the public informed of site activities and has met with representatives of various City of Newark agencies including the Fire Department, the Office of Emergency Management and the Department of Engineering. In addition, EPA cooperated with the Hazmat Team of the Newark Fire Department in a training exercise at the IMS site. The Hazmat Team was guided through the building by the EPA and shown the location of the hazardous chemicals. This exercise and a description of the site were reported in a lengthly article in the Star-Ledger. EPA regularly issues "Pollution Reports" describing site activities, planned work and the status of responsible party investigations. Reports were issued two to three times a week when the work at the IMS site was most intensive and were sent to your attention. Representatives of your Department and the Office of Emergency Management have observed our activities at the site since March of 1988 and also asked for additional information which was extended to them. A copy of the Administrative Record, which contains copies of investigations, correspondence and documentation leading to the Removal Action was available at the site during the removal activity and remains available at our Regional offices.

I trust that the above information adequately addresses your concerns. The EPA continues to be interested in working with a private party to clean the site.

Thank you for your continued interest in environmental matters and controlling hazardous wastes in your city. If you have any questions, please contact James Schmidtberger, at (312) 264-2646.

Sincerely yours,

Stephen D. Luftig, Director
Emergency and Remedial Response Division
bcc: R. Salkie, ERR-RPO
cc: J. Gaeths, ERR-RP
J. Witkowski, ERR-RP
J. Shaw, ERR-RP
J. Czapor, ERR-SC
D. Karlen, ORC-SUP
M. Randol, OEP
2 CCO

LASER PRODUCT CORP

RD #2 360A COGAN STATION PA 17728

ENVIRONMENTAL PROTECTION AGENCY, REGION II
1987 DEC 23 PM 2:41
ERRD SITE COMPLIANCE BRANCH

Rec'd copy 1/4/88

DEC 16, 1987

MR. STEPHEN LUFTIG, DIR. OF EMERGENCY REMEDIAL RESPONSE DIV.
US ENVIRONMENTAL PROTECTION AGENCY
REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

RE: INTERNATIONAL METALLURGICAL SERVICES
196 BLANCHARD STREET, NEWARK, NEW JERSEY

DEAR MR. LUFTIG;

CONCERNING THE PROPOSED PRIVATE CLEANUP OF 196 BLANCHARD PLEASE NOTE THE FOLLOWING:

WE WOULD HAVE NO DIFFICULTY IN PROVIDING EPA WITH ALL NECESSARY SITE-SPECIFIC WORK PLANS FOR THE CLEANUP OF 196 BLANCHARD STREET. WE COULD EVEN ARRANGE TO HAVE THE CAVANAUSH GROUP TAKE POCESSION OF THE BUILDING AND SUPPLY ALL NECESSARY PERMITS, HEALTH AND SAFETY REQUIREMENTS, AND SAMPLING ACTIVITIES INCLUDING LAB QA AND QC PROGRAMS. BEFORE WE WOULD PROVIDE YOU WITH THIS DETAILED INFORMATION WE MUST FIRST UNDERSTAND WHAT IS THE EPA'S POSITION ON THE POSSIBLE SUB-SURFACE GROUND AND WATER CONTAMINATION. WE BELIEVE FROM THE SAMPLING OF GROUND WATER AND SOIL THAT ANY CONTAMINATION FOUND IN THESE SAMPLES IS COMING FROM THE SURROUNDING AREA. WE CAN ASSURE YOU THAT WE CAN REMEDIATE THE CHEMICALS IN THE BUILDING INCLUDING DECONTAMINATION OF THE FLOORS AND WALLS. WE CAN ASSURE YOU OF PROPER DISPOSTION OF THE CHEMICALS AND REMEDIATION OF THE TOP 2 INCHES OF SOIL. WE CANNOT HOWEVER, TAKE THE POSITION OF BEING RESPONSIBLE FOR WHAT IS CLEARLY TO US CONTAMINANTS LEACHING FROM THE SURROUNDING AREAS. WE ARE AWARE OF THE CERCLA REQUIREMENTS AND ECRA REQUIREMENTS. BASED ON THE SAMPLING WE HAVE ALREADY PERFORMED WE DO NOT FEEL IT SHOULD BE A PROBLEM, BUT IT MUST BE ADDRESSED AND LEGAL LIABILITY OF THE SUB-SURFACE SOIL AND GROUND WATER MUST BE ADDRESSED BEFORE WE COULD AGREE TO UNDERTAKE THE PROPOSED CLEAN-UP.

FROM J. SHAW

COPY TO:

G. ZACHOS
R. COBIELLA
J. WITKOWSKI

WE DO APPRECIATE EPA BRINGING TO OUR ATTENTION THE POSSIBLE LIABILITY INCURRED IN A PROPOSED PRIVATE CLEANUP OF THIS SITE. WE DO FEEL EVERY EFFORT SHOULD BE MADE TO ALLOW THIS PRIVATE CLEANUP TO HAPPEN BECAUSE THIS WOULD BE A SHOW CASE CLEANUP AND PAVE THE WAY FOR MANY FUTURE PRIVATE CLEANUPS TO OCCUR IN NEWARK. IS IT NOT BETTER FOR INDUSTRY TO CLEAN UP THESE SITES WITH PRIVATE MONEY THAN TO CONTINUE DRAINING THE RESOURSES OF THE EPA AND THE NJDEP? WE URGE YOUR LAWYERS TO SERIOUSLY CONSIDER THE ABOVE MATTER AND REPLY TO OUR CONCERNS.

THANK YOU FOR YOUR TIME AND PATIENCE IN THESE MATTERS. WE DO APPRECIATE MR SCHMIDTBERGER'S TIME AND PATIENCE IN THESE MATTERS.

SINCERELY,

ERIC CHEETHAM
PRESIDENT

CC: JASON WORKMAN, PRESIDENT STYLE VI LIMITED
JAMES SCHMIDTBERGER, EPA SITE COMPLIANCE
DAVE BEEMAN, METRO OFFICE DEP
BOB CALANDRA, CAVANAUGH GROUP
AL ZACH, DIRECTOR OF ENGINEERING, CITY OF NEWARK

2.2 SAMPLING AND ANALYSIS PLAN

WESTON • SPER Suite 201, 1090 King Georges Post Road,
Edison, NJ 08837 • (201) 225-6266

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-7367

TAT-02-F-04162 MEMORANDUM

TO: John Shaw
Response and Prevention Branch, U.S. EPA

FROM: Michael Mentzel TAT II MM
Therese Perrette TAT II TP

SUBJECT: Soil Sampling Program
IMS
Newark, New Jersey

DATE: October 26, 1987

Attached please find the report concerning the sampling program for the soil surrounding the building IMS site.

Attachment

INTERNATIONAL METALLURGICAL SERVICES
SOIL SAMPLING PLAN

Michael Mentzel
USEPA Technical Assistance Team
October 23, 1987

1. PROJECT NAME: IMS Soil Sampling
Newark, New Jersey

2. PROJECT REQUESTED BY: John Shaw
Response and Prevention Branch
U.S. EPA

3. DATE REQUESTED: October 22, 1987

4. DATE OF PROJECT INITIATION: October 28, 1987

5. PROJECT OFFICER: Michael Mentzel, TAT II

6. QUALITY ASSURANCE OFFICER: Therese Perrette. TAT II

7. PROJECT DESCRIPTION:

A. Objective and Scope:

The objective of this sampling program is to determine if soil surrounding the IMS building is contaminated with heavy metals, PCB's or other suspected compounds which would prevent use of the property for the clean up command post and equipment storage.

B. Data Usage:

Data obtained from the sampling and analysis of the wastes will be used as specified in 7.A.

C. Parameter Table:

Parameter	Number of Samples[1]	Sample Matrix[2]	Analytical Mtd. Ref.	Sample Preservation[3]	Holding Time[3]	Sample Size
PCB/PEST	4	Soil	SW 846 8080	Cool 4°c	14 Days	100 g
EP Toxicity	4	Soil	EPA Test Methods SW-846 2nd Ed.	Cool 4°c	N/A	100 g
Heavy Metals + Gold	4	Soil	SW 846	Cool 4°C	6 mos.	200 g
Cyanide	4	Soil	SW 846 9010	Cool 4°C	N/A	200 g

8. PROJECT FISCAL INFORMATION:

Sampling and manpower shall be provided by Technical Assistance Team.

9. PROJECT ORGANIZATION AND RESPONSIBILITY:

The following is a list of key project personnel and their corresponding responsibilities:

John Shaw, U.S. EPA	Project Director/ Sampling Operation
John Witkowski, U.S. EPA	Project Over Sight
Michael Mentzel, TAT II	Sampling Operation
Barbara Jakub, TAT II	Sample Assistance
Therese Perrette, TAT II	Project Audit and Quality Control
Therese Perrette, TAT II	Sampling Operation/ Documentation

10. DATA QUALITY REQUIREMENTS AND ASSESSMENTS:

Parameter	Sample Matrix	Det. Lmt.	Est. Acc.	Acc. Prot.	Est. Precision	Prec. Prot.
EP Toxicity	Solid	MDL[1]	Method Dependent	Lab[2] QA/QC Guidelines Will Be Reviewed Prior to Sample Analysis	RPD[3]	Duplicate of Every 20th Sample. QA/QC Dependent

Parameter	Sample Matrix	Det. Lmt.	Est. Acc.	Acc. Prot.	Est. Preci-sion	Prec. Prot.
PCB's/ Pesticides	Solid	MDL	20-150%	14.2 14.3	RPD	Duplicate of Every 20th Sample
Heavy Metals	Solid	MDL		14.3 14.4 14.5		

[1]Method Detection Limit

[2]QA/QC for RCRA and Compatibility are subject to chosen laboratories' specifications. Chosen laboratories' QA/QC package will be reviewed prior to analysis.

[3]Relative percent difference not to be greater than 30%.

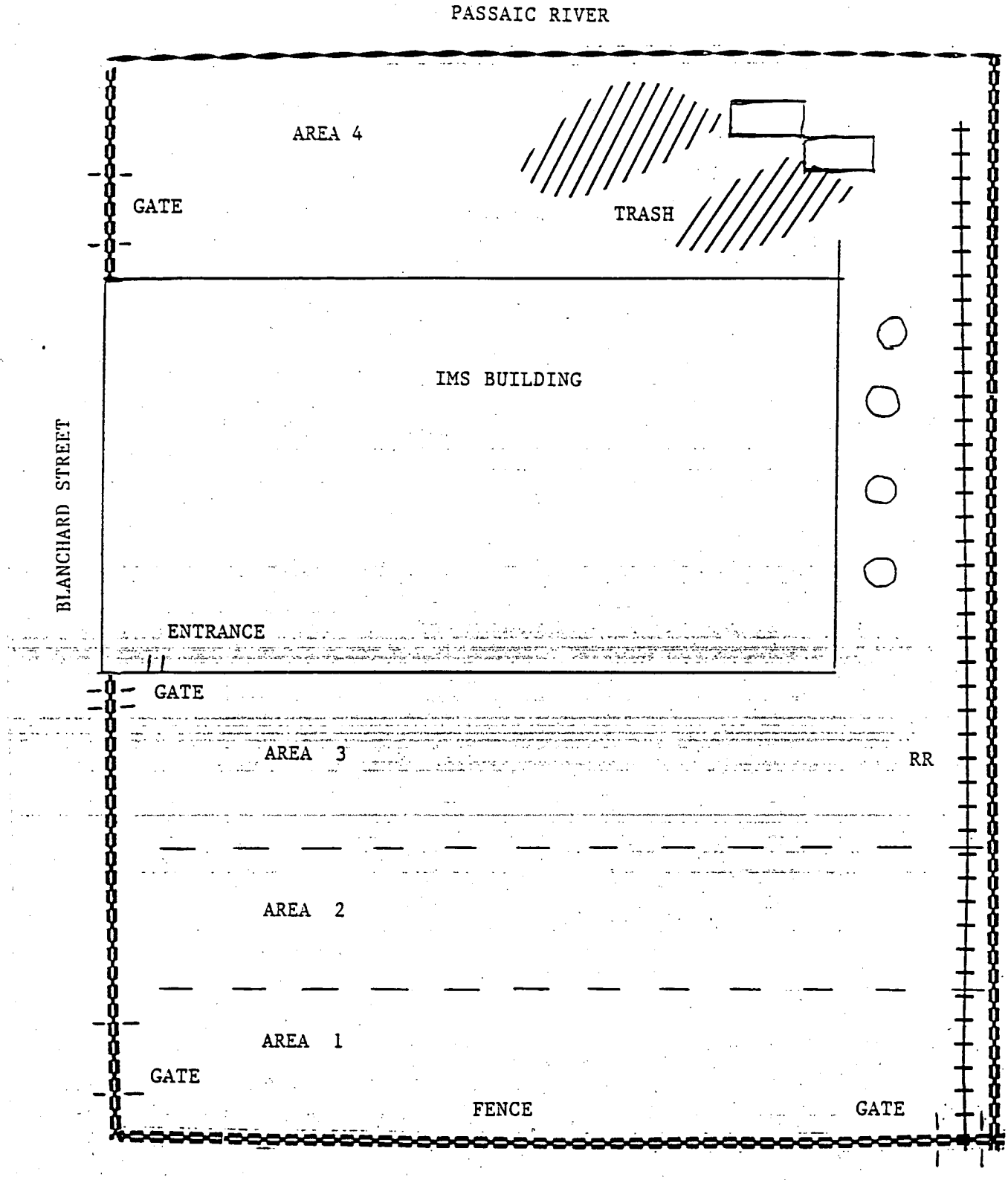
11. SAMPLING PROCEDURE:

One composite sample will be taken at each of the four areas designated in Figure 1. The composite sample will consist of soil scooped up with a stainless steel trowel at three locations to a depth of 2 inches. The soil obtained will be thoroughly mixed to form a homogenious sample. Samples will be placed in one quart jars supplied by the EPA sample management office.

All sampling efforts will take place in level 'C' protection in order to eliminate potential exposure to harmful substances during the time soil is being disturbed. One blank sample consisting of distilled water will be supplied with the samples taken.

One sample will be taken by scooping twice the quantity soil needed, mixing to homogenicity and splitting into two separate jars. These will be submitted for matrix spike duplicate.

All sample jars will be wiped with paper towels and placed in ziploc bags. These will then be placed in a cooler for transport to the chosen laboratory following DOT regulations. Individual field data sheets will be completed for each composite sample listing location of each sample point and other pertinent information. Sample points will be marked with wooden stakes.



WESTON — SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM JOHN SHAW	FIGURE 1
In Association with ICF Technology Inc., C.C. Johnson & Associates, Inc., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.	TAT PM MICHAEL MENTZEL	SAMPLE LOCATIONS

12. SAMPLE CUSTODY PROCEDURES:

EPA Chain-of-Custody will be filled out and maintained throughout entire site activities as per TAT SOP on sample handling, Sampling Container Contract specifications, and EPA Laboratories SOP. The Chain-of-Custody form to be used lists the following information:

i. Sample number.
ii. Number of sample containers.
iii. Description of samples including specific location of sample collection.
iv. Identity of person collecting the sample.
v. Date and time of sample collection.
vi. Date and time of custody transfer to laboratory (if the sample was collected by a person other than laboratory personnel).
vii. Identity of person accepting custody (if the sample was collected by a person other than laboratory personnel).
viii. Identity of the laboratory performing the analysis.

13. DOCUMENTATION, DATA REDUCTION AND REPORTING:

Documentation: Field data will be entered into a bound notebook. Field notebooks, Chain-of-Custody forms, and laboratory analysis reports will be filed and stored per the TAT Document Control System.

14. QUALITY ASSURANCE AND DATA REPORTING:

QA/QC to be furnished by the contracted laboratory in performance of the analysis will consist, at a minimum, of the following measures to ensure accurate data:

1. One set of field blanks consisting of organic free water will be shipped unopened to the laboratory. This blank is to be analyzed in order to ensure that no contamination has occurred.

2. At least 1 surrogate compound is to be used for the samples collected for PCB's/Pesticides analysis*.

   Results will be documented and submitted in the written report.

3. Matrix spike and matrix spike duplicate analysis will be performed on one sample. Results will be documented and submitted in the written report.

4. Prior to metals and cyanide analysis, a linearity calibration curve is to be constructed by analyzing standards spanning the anticipated range of samples to be analyzed.*

5. Standard calibration curves for metals and cyanide analysis shall consist of a minimum of a reagent blank and four standards for each element to be analyzed.*

6. The contracted laboratory will also furnish the following additional information as warranted:

*As required.
**For recovery ranges see Section 10.

a) Copies of all spectral data obtained during performance of analysis. Copies should be signed by the analyst and checked by the Laboratory Manager.

b) Data System Printout

- Quantitation report or legible facsimile

c) Manual work sheets.

d) Identification and explanation of any analytical modifications used that differ from U.S. EPA protocol.

Project and Quality Assurance Officers will be responsible for accurate reporting of data emanating from the sampling report.

15. DATA VALIDATION:

All steps of data generation and handling will be evaluated by the On-Scene Coordinator, the Project Officer and the Quality Assurance Officer for compliance with EPA Region II SOP for validating hazardous waste site data.

16. SYSTEM AUDIT:

The QA/QC Officer will observe the sampling operations and review subsequent analytical data to assure that the QA/QC project plan has been adhered to.

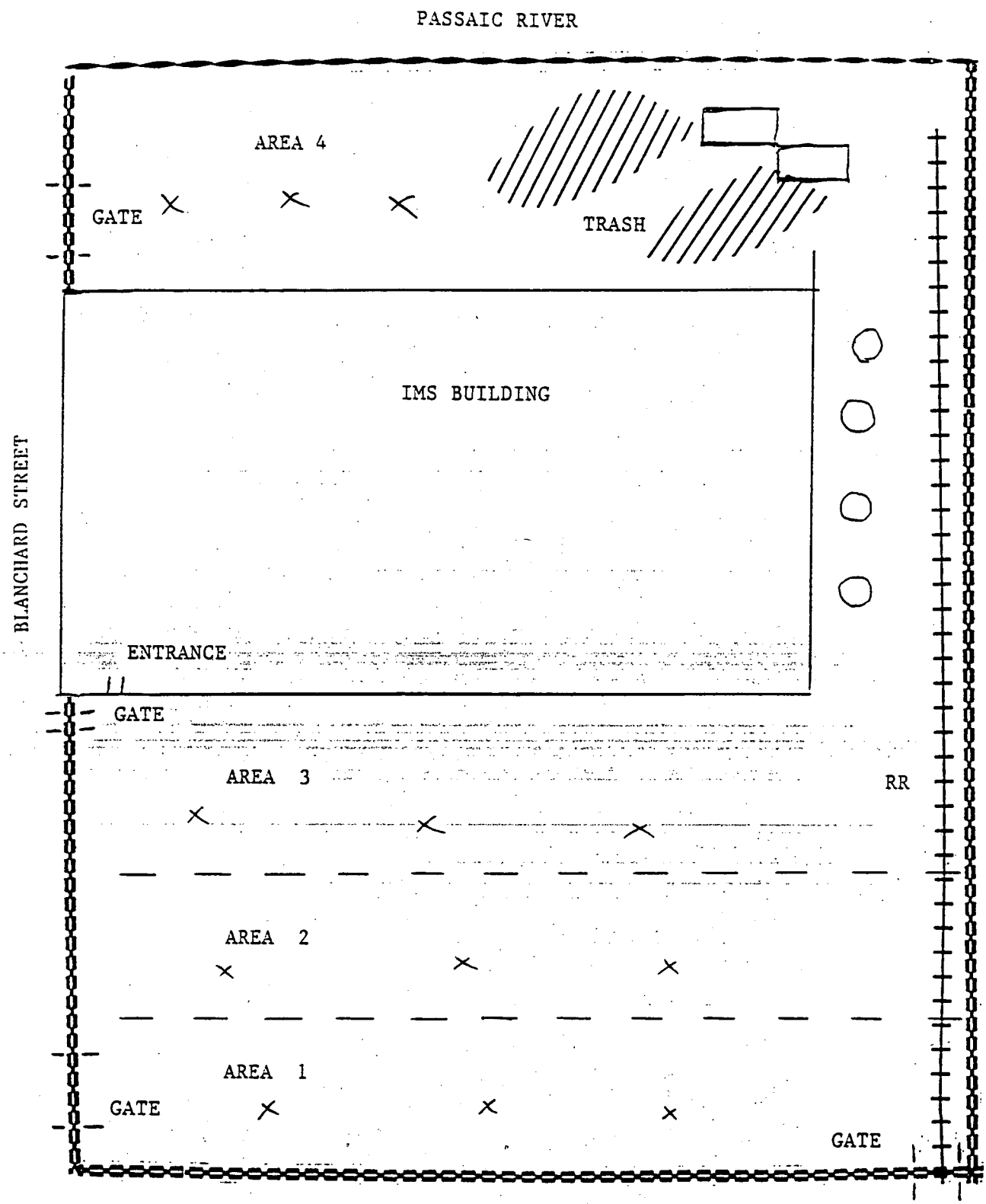
17. CORRECTIVE ACTION:

All provisions in the field and laboratory will be taken to ensure that any problems that may develop will be dealt with as

quickly as possible to ensure the continuity of the sampling program. Any deviations from this sampling plan will be noted in the final report.

18. REPORTS:

Draft reports will be issued 14 days after receipt of laboratory results. Final reports will be issued 7 days after return of draft report by the EPA's Project Manager.



WESTON	SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM JOHN SHAW	FIGURE 1
In Association with ICF Technology Inc., C.C. Johnson & Associates, Inc., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.		TAT PM MICHAEL MENTZEL	SAMPLE LOCATIONS

CHAIN OF CUSTODY RECORD

ENVIRONMENTAL PROTECTION AGENCY – REGION II
Environmental Services Division
EDISON, NEW JERSEY 08817

Name of Unit and Address: USEPA TECHNICAL ASSISTANCE TEAM (TAT)
EPA-OSC
JOAN SHAW
1090 KING GEORGE POST RD EDISON NJ 2012256116
IMS SITE CONTACT T. PERRETTE

Sample Number	Number of Containers	Description of Samples
091316	4	SOIL 4x 8oz GLASS JARS
091317	8	SOIL 4x 8oz GLASS JARS
091318	4	SOIL 4x 8oz GLASS JARS
091319	4	SOIL 4x 8oz GLASS JARS

Person Assuming Responsibility for Sample: MICHAEL MENTZEL (TAT) [signature] Time 1200 Date 9/28/[illegible]

Sample Number	Relinquished By:	Received By:	Time	Date	Reason for Change of Custody
ALL	[signature]	[signature]			DELIVERY TO LABORATORY
Sample Number	Relinquished By:	Received By:	Time	Date	Reason for Change of Custody
Sample Number	Relinquished By:	Received By:	Time	Date	Reason for Change of Custody
Sample Number	Relinquished By:	Received By:	Time	Date	Reason for Change of Custody

FIELD DATA SHEET

ENVIRONMENTAL PROTECTION AGENCY - Region II, Edison, New Jersey

ENVIRONMENTAL SERVICES DIVISION

Project Name MS

Collector(s) MM EJ Affiliation TAT

SAMPLING METHOD (Circle)

Kemmerer Dredge Ponar Manual
Niskin Net Seine Trawl Bucket
Trowel Cream Dipper
Automatic
Other _____

LDMS CODE _____

DATA BASE CODE _____

STA. TYPE CODE _____

SUBSTRATE TYPE (Circle) Aqueous Sediment Sludge Oil Biological
Solvent Extract Other (SOIL)

BOD — Seed Supplied ☐ Yes ☐ No Source:

Sample Preparation (Circle)		Sample Source Type (Circle)	
Container	Cleaning Procedure	Landfill	Industrial
Glass Jar	Detergent Wash	Leachate	Effluent
Plastic Jar	Water Rinse	Drum	Process Stream
Metal	Acid Rinse	Test Well	Holding Pond
POA Vial	Solvent Rinse:	Depth:	Drum
Cubitainer	Acetone	Other: _____	Waste Pile
Acetate Core	Hexane	_____	Municipal Treatment
Paper Cap	Methylene Chloride	Storage Tank	Influent
Teflon Cap	Other (Specify): SMO PREPARED	Top	Effluent-Cl
Foil Cap		Middle	Effluent-Non Cl
Other _____		Bottom	Sludge
_____		Truck	Ambient
Preservation		Drum	Lake
Acid _____		Tank	Stream
Solvent _____		Other _____	Pond
Chemical _____		_____	Ocean
Wet Ice		Wells	Estuary
Dry Ice		Monitoring	SOIL
Ambient		Production	
Other _____		Drinking	
_____		Private	

Sample Location Description:

1A 0950 hrs
1B 0955 hrs
1C 0960 hrs

SOIL SAMPLE TAKEN TO A DEPTH OF 2 INCHES
MUCH GRAVEL WAS ON SURFACE

Remarks:

COMPOSITE SAMPLE TAKEN FROM 3 POINTS IN AREA 1' (AS SHOWN IN SAMPLING PLAN
THOROUGHLY MIXED & PLACED IN FOUR 8OZ JARS

Samples to:

Bact	Bio	Chem	Other
		X	

Station No.

Sample Depth (Ft.)/Fac. Loc. Code

Lab Number: 091316

Type of Sample

Grab	Composite	
	Time	Space
X		

Collection (Ending) Date

Yr	Mo	Day
87	10	25

Ending Time (24 Hr): 1000

Beginning Date

Yr	Mo	Day
87	10	25

Beginning Time (24 Hr): 0950

pH

Sample Temp. (°C)

DO (mg/l)

Cond. (uMHOS/CM)

Salinity(‰)

Sample Split

☐ Yes ☒ No

If Yes With Whom?

Receipt ☐ Yes ☐ No

Form: FTB RPD-11-82-2

FIELD DATA SHEET

ENVIRONMENTAL PROTECTION AGENCY - Region II, Edison, New Jersey

ENVIRONMENTAL SERVICES DIVISION

Project Name EMS

Collector(s) MM/BJ Affiliation TAT

SAMPLING METHOD (Circle)

Kemmerer Dredge Ponar Manual
Niskin Net Seine Trawl Bucket
(Trowel) Cream Dipper
Automatic
Other _____

LDMS CODE _____

DATA BASE CODE _____

STA. TYPE CODE _____

SUBSTRATE TYPE (Circle) Aqueous Sediment Sludge Oil Biological
Solvent Extract Other (Soil)

BOD — Seed Supplied ☐ Yes ☐ No Source:

Sample Preparation (Circle)		Sample Source Type (Circle)	
Container	Cleaning Procedure	Landfill	Industrial
(Glass Jar)	Detergent Wash	Leachate	Effluent
Plastic Jar	Water Rinse	Drum	Process Stream
Metal	Acid Rinse	Test Well	Holding Pond
POA Vial	Solvent Rinse:	Depth:	Drum
Cubitainer	Acetone	Other: _____	Waste Pile
Acetate Core	Hexane	_____	Municipal Treatment
Paper Cap	Methylene Chloride	Storage Tank	Influent
Teflon Cap	Other (Specify):	Top	Effluent-Cl
Foil Cap	SMO prepared	Middle	Effluent-Non Cl
Other _____		Bottom	Sludge
_____		Truck	Ambient
Preservation		Drum	Lake
Acid _____		Tank	Stream
Solvent _____		Other _____	Pond
Chemical _____		_____	Ocean
(Wet Ice)		Wells	Estuary
Dry Ice		Monitoring	SOIL
Ambient		Production	
Other _____		Drinking	
_____		Private	

Sample Location Description:

SAMPLE TAKEN TO A DEPTH OF ~2 INCHES
GRAVEL ON SURFACE

Remarks:

Composite sample taken from 3 points in area (as shown in sampling plan
SAMPLES THOROUGHLY MIXED & PLACED IN FOUR 8 oz JARS

Samples to:

Bact	Bio	Chem	Other
		X	

Station No.

Sample Depth (Ft.)/Fac. Loc. Code

Lab Number: 091317

Type of Sample

Grab	Composite	
	Time	Space
X		

Collection (Ending) Date: Yr 87 Mo 10 Day 28

Ending Time (24 Hr): 1020

Beginning Date: Yr 87 Mo 10 Day 28

Beginning Time (24 Hr): 1010

pH

Sample Temp. (°C)

DO (mg/l)

Cond. (uMHOS/CM)

Salinity(‰)

Sample Split

☐ Yes ☒ No

If Yes With Whom?

Receipt ☐ Yes ☐ No

Form: FTB RPD-11-82-2

FIELD DATA SHEET

ENVIRONMENTAL PROTECTION AGENCY - Region II, Edison, New Jersey

ENVIRONMENTAL SERVICES DIVISION

Project Name LMS

Collector(s) MM/BS Affiliation TAT

SAMPLING METHOD (Circle)

Kemmerer Dredge Ponar Manual
Niskin Net Seine Trawl Bucket
(Trowel) Cream Dipper
Automatic
Other _____

LDMS CODE _____

DATA BASE CODE _____

STA. TYPE CODE _____

SUBSTRATE TYPE (Circle) Aqueous Sediment Sludge Oil Biological
Solvent Extract Other (SOIL)

BOD — Seed Supplied ☐ Yes ☐ No Source:

Sample Preparation (Circle)		Sample Source Type (Circle)	
Container	Cleaning Procedure	Landfill	Industrial
Glass Jar	Detergent Wash	Leachate	Effluent
Plastic Jar	Water Rinse	Drum	Process Stream
Metal	Acid Rinse	Test Well	Holding Pond
POA Vial	Solvent Rinse:	Depth:	Drum
Cubitainer	Acetone	Other: _____	Waste Pile
Acetate Core	Hexane	_____	Municipal Treatment
Paper Cap	Methylene Chloride	Storage Tank	Influent
Teflon Cap	Other (Specify):	Top	Effluent-Cl
Foil Cap	SMO prepared	Middle	Effluent-Non Cl
Other _____		Bottom	Sludge
_____		Truck	Ambient
Preservation		Drum	Lake
Acid _____		Tank	Stream
Solvent _____		Other _____	Pond
Chemical _____		_____	Ocean
(Wet Ice)		Wells	Estuary
Dry Ice		Monitoring	soil
Ambient		Production	
Other _____		Drinking	
_____		Private	

Sample Location Description:

SAMPLE TAKEN A DEPTH OF ~2 INCHES
GRAVEL ON SURFACE

Remarks: Composite sample taken from 3 points in Area #3 (as shown in sampling plan)
SAMPLES THOROUGHLY MIXED AND PLACED IN FOUR 8OZ JARS

Samples to:

Bact	Bio	Chem	Other

Station No.

Sample Depth (Ft.)/Fac. Loc. Code

Lab Number: 091318

Type of Sample

Grab	Composite	
	Time	Space
X		

Collection (Ending) Date

Yr	Mo	Day
87	10	28

Ending Time (24 Hr): 1120

Beginning Date

Yr	Mo	Day
87	10	28

Beginning Time (24 Hr): 1100

pH

Sample Temp. (°C)

DO (mg/l)

Cond. (uMHOS/CM)

Salinity(‰)

Sample Split

☐ Yes ☒ No

If Yes With Whom?

Receipt ☐ Yes ☐ No

Form: FTB 2PD-11-82-2

FIELD DATA SHEET

ENVIRONMENTAL PROTECTION AGENCY - Region II, Edison, New Jersey

ENVIRONMENTAL SERVICES DIVISION

Project Name IMS

Collector(s) MM/DJ Affiliation TAT

SAMPLING METHOD (Circle)

Kemmerer Dredge Ponar Manual
Niskin Net Seine Trawl Bucket
(Trowel) Cream Dipper
Automatic
Other _____

LDMS CODE _____

DATA BASE CODE _____

STA. TYPE CODE _____

SUBSTRATE TYPE (Circle) Aqueous Sediment Sludge Oil Biological
Solvent Extract Other (SOIL)

BOD — Seed Supplied ☐ Yes ☐ No Source:

Sample Preparation (Circle)		Sample Source Type (Circle)	
Container	Cleaning Procedure	Landfill	Industrial
(Glass Jar)	Detergent Wash	Leachate	Effluent
Plastic Jar	Water Rinse	Drum	Process Stream
Metal	Acid Rinse	Test Well	Holding Pond
POA Vial	Solvent Rinse:	Depth:	Drum
Cubitainer	Acetone	Other: _____	Waste Pile
Acetate Core	Hexane	_____	Municipal Treatment
Paper Cap	Methylene Chloride	Storage Tank	Influent
Teflon Cap	Other (Specify):	Top	Effluent-Cl
Foil Cap	SNO prepared	Middle	Effluent-Non Cl
Other _____		Bottom	Sludge
_____		Truck	Ambient
Preservation		Drum	Lake
Acid _____		Tank	Stream
Solvent _____		Other _____	Pond
Chemical _____		_____	Ocean
(Wet Ice)		Wells	Estuary
Dry Ice		Monitoring	soil
Ambient		Production	
Other _____		Drinking	
_____		Private	

Sample Location Description:

SOIL SAMPLE TAKEN TO
A DEPTH OF ~2 INCHES
SOME GRAVEL ON SURFACE.

Remarks: composite sample from 3 points in area #4 (as shown in sampling plan)
SAMPLES THOROUGHLY MIXED AND PLACED IN FOUR 8 OZ JARS.

Samples to:

Bact	Bio	Chem	Other
		X	

Station No. _____

Sample Depth (Ft.)/Fac. Loc. Code _____

Lab Number 091319

Type of Sample

Grab	Composite	
	Time	Space
X		

Collection (Ending) Date

Yr	Mo	Day
87	11	28

Ending Time (24 Hr) 1135

Beginning Date

Yr	Mo	Day
87	10	28

Beginning Time (24 Hr) 1120

pH _____

Sample Temp. (°C) _____

DO (mg/l) _____

Cond. (uMHOS/CM) _____

Salinity(‰) _____

Sample Split

☐ Yes ☒ No

If Yes With Whom?

Receipt ☐ Yes ☐ No

Form: FTB RPD-11-82-2

DATE March 17, 1988

SITE NAME I.M.S Newark · TEMPERATURE (°F avg.) 36 ambient

SAMPLED BY G. Disante/D. Triggs HUMIDITY (%) _____

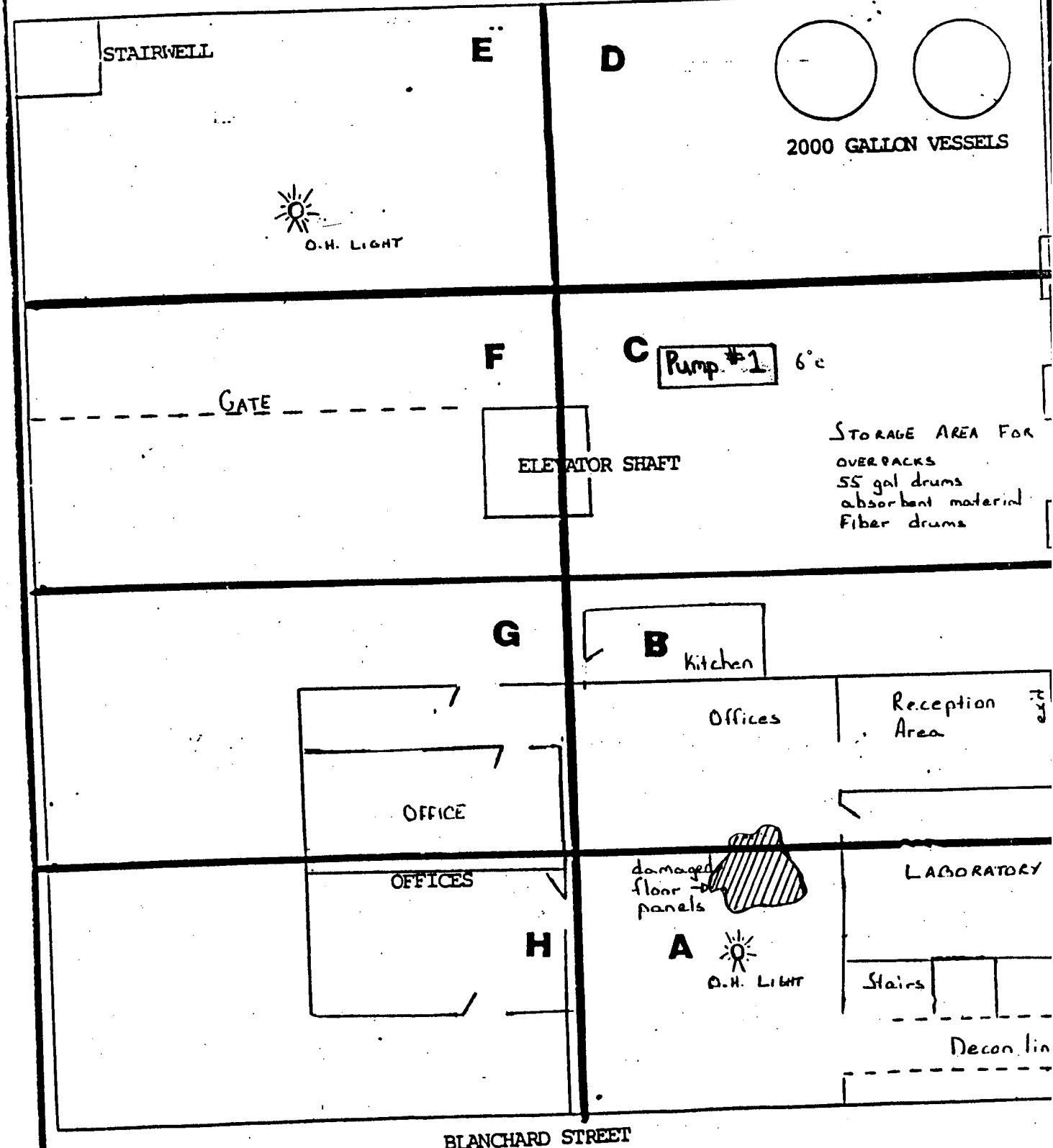
WIND DIRECTION from the northwest BAROMETRIC PRESSURE _____

SAMPLE NO.	LOCATION	PUMP ID NO.	START TIME	START READING	STOP TIME	STOP READING
31788-1	1st Floor/quad C	ASP63	0928	2 l/min	1435	2 l/min
31788-2	2nd Floor/quad C	ASP64	0935	2 l/min	1440	2 l/min
31788-3	2nd Floor/Duplicate	ASP58	0935	2 l/min	1440	2 l/min
31788-4	3rd Floor/quad G	ASP62	0939	2 l/min	1444	2 l/min
31788-5	4th Floor/quad G	ASP61	0944	2 l/min	1447	1.95 l/min
31788-6	Outside upwind from building quad 4	EPA 658051	1013	2 l/min	1535	2 l/min
31788-7	Outside downwind from building quad 1	EPA 658052	1007	2 l/min	1533	1.95 l/min
31788-8	4th floor work area G	EPA 658046	0942	2 l/min	1448	2 l/min
31788-9	Blank	—	—	—	—	—

COMMENTS (RAIN, DAMAGED PUMP, ETC.) Air sampling for Beryllium 0.8 micron mixed cellulose ester filter. (NIOSH S-339)

INTERNATIONAL METALLURGICAL SERVICES

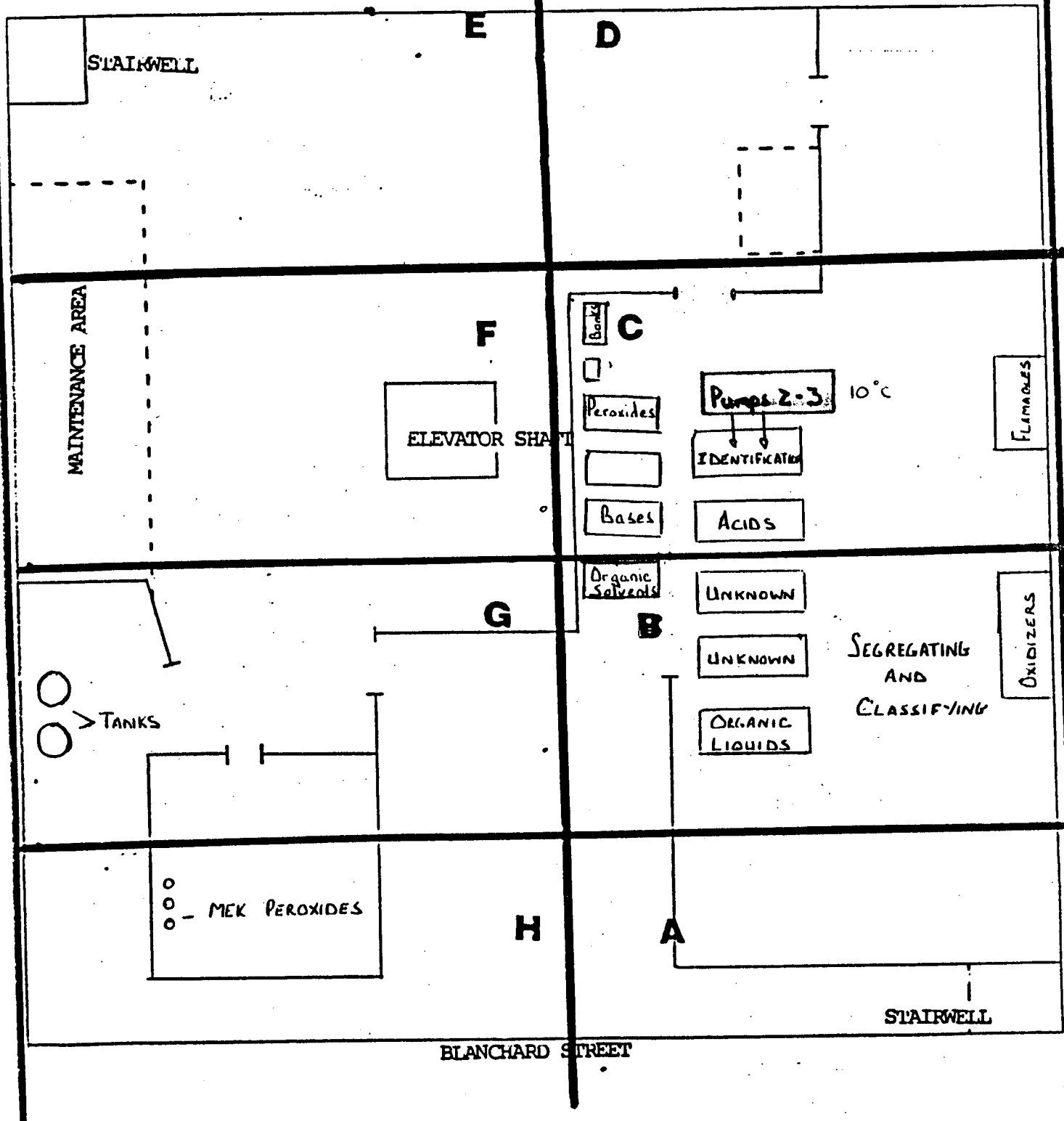
FIRST FLOOR - NOT TO SCALE



WESTON	SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM JOHN SHAW	FIGURE 3
In Association with ICF Technology Inc., C.C. Johnson & Associates, Inc., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.		TAT PM MICHAEL MENTZEL	1ST FL. BLDG. LAYO IMS NEWARK, NJ

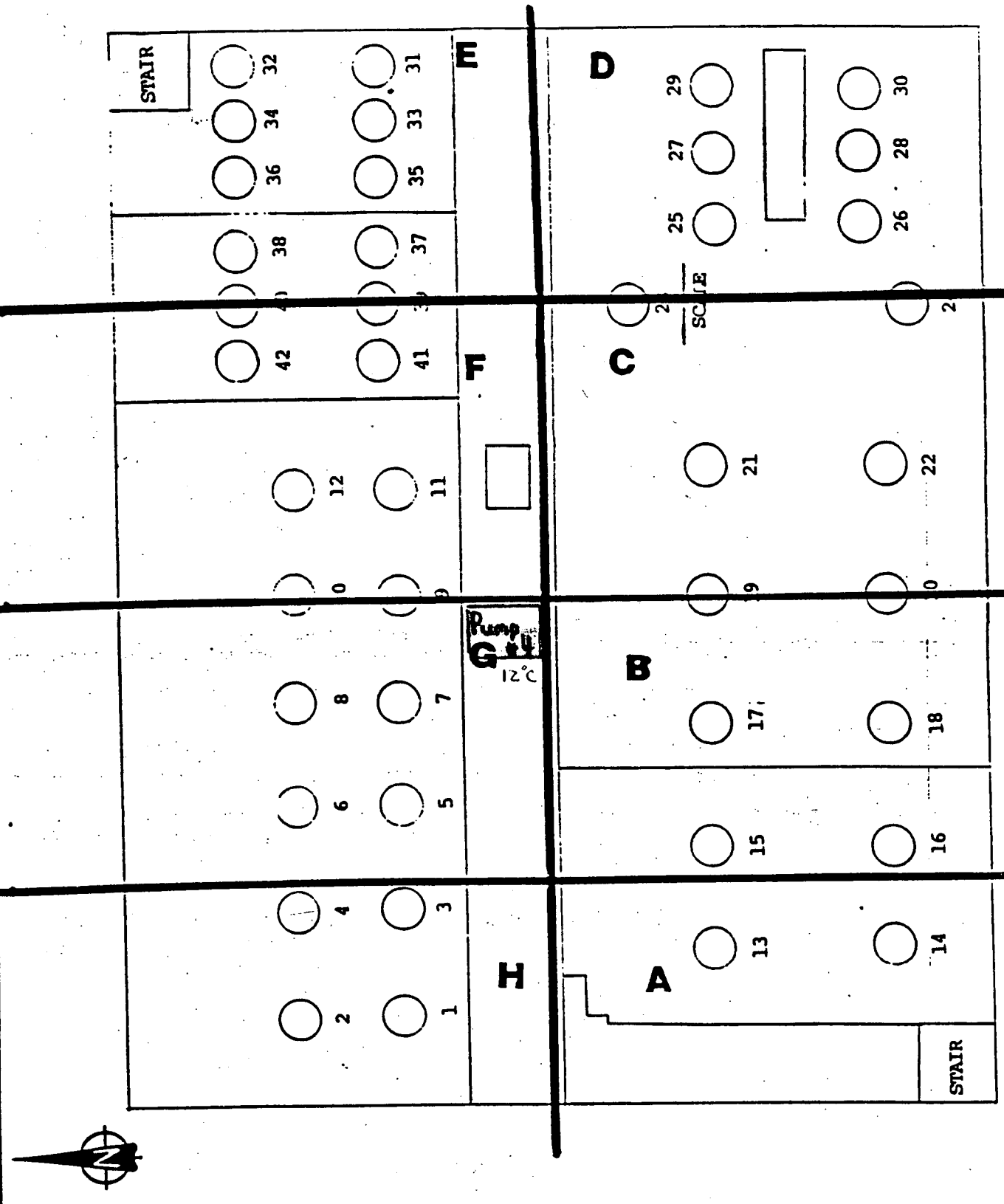
SECOND FLOOR - NOT TO SCALE

INTERNATIONAL METALLURGICAL SERVICES



WESTON	SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM JOHN SHAW	FIGURE 4
In Association with ICF Technology Inc., C.C. Johnson & Associates, Inc., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.		TAT PM MICHAEL MENTZEL	2ND FL. BLDG. LAYOUT IMS NEWARK, NJ

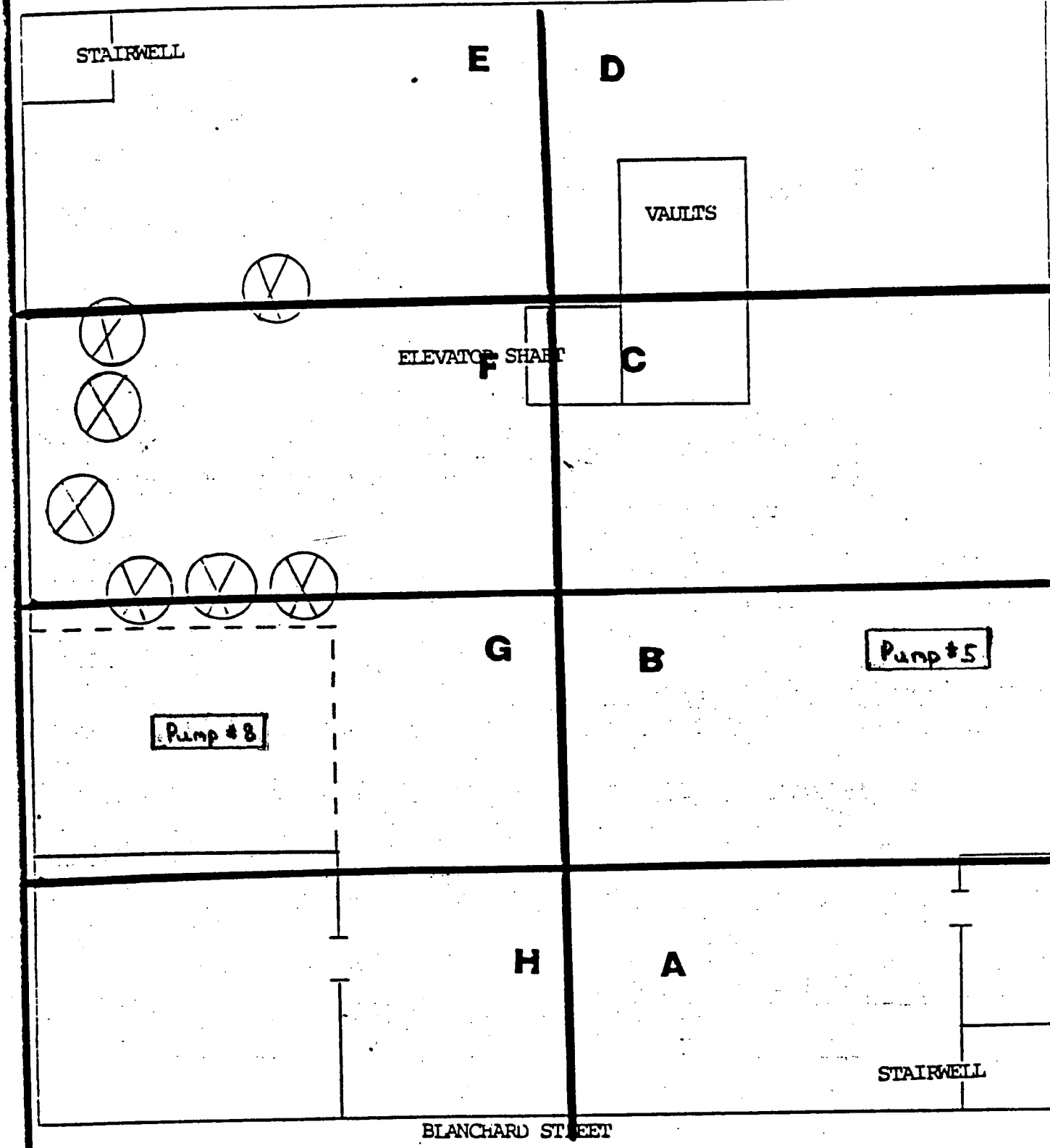
3rd FLOOR TANKS



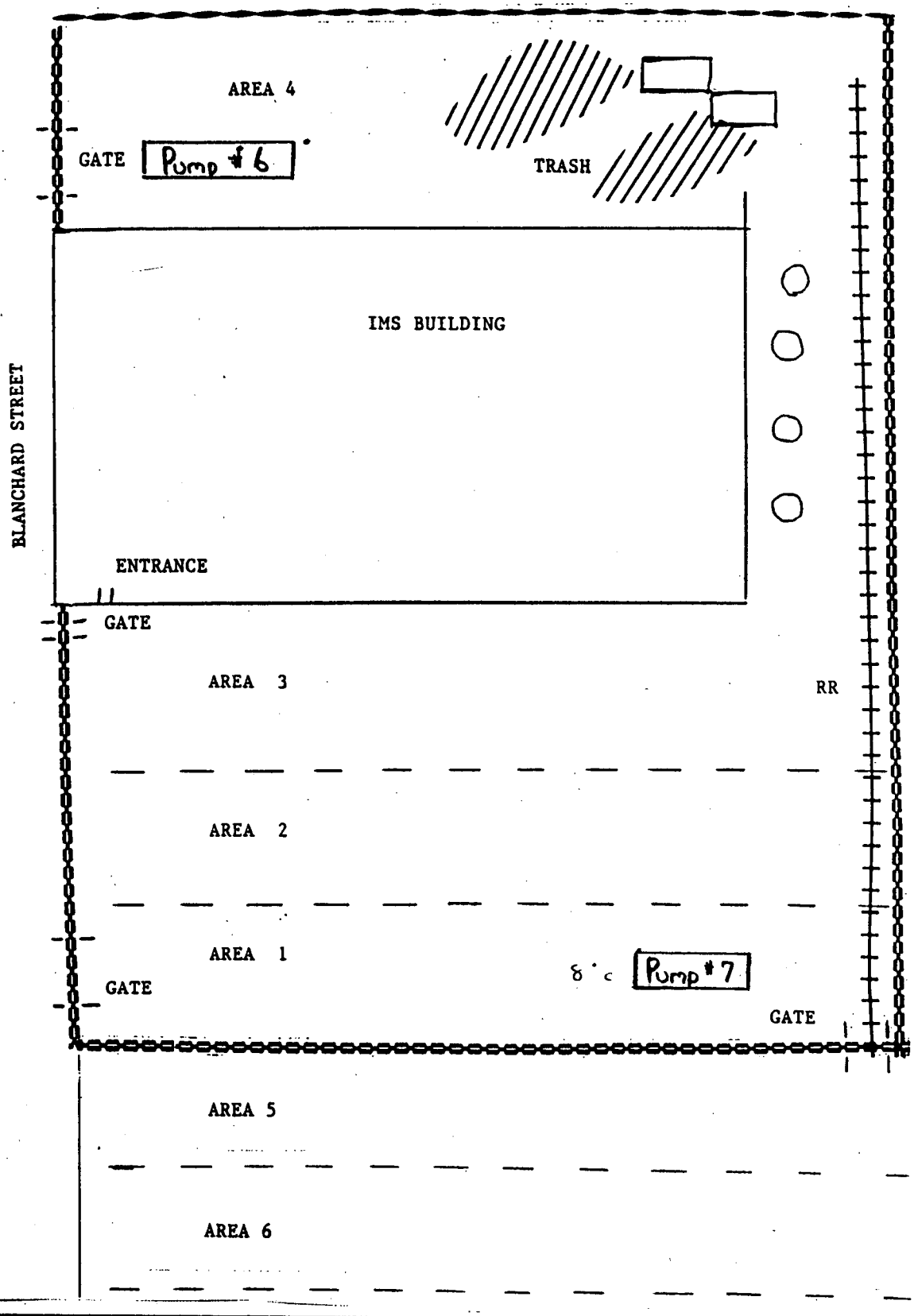
WESTON — SPILL PREVENTION & EMERGENCY RESPONSE DIVISION		EPA PM JOHN SHAW	FIGURE 5
In Association with ICF Technology Inc., C.C. Johnson & Associates, Inc., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.		TAT PM MICHAEL MENTZEL	3RD. FL. BLDG. LAYOU IMS NEWARK, NJ

FOURTH FLOOR - NOT TO SCALE

INTERNATIONAL METALLURGICAL SERVICES



WESTON SPILL PREVENTION & EMERGENCY RESPONSE DIVISION		EPA PM JOHN SHAW	FIGURE 6
In Association with ICF Technology Inc., C.C. Johnson & Associates, Inc., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.		TAT PM MICHAEL MENTZEL	4TH FL. BLDG. LAYOU IMS NEWARK, NJ



WESTON SPILL PREVENTION & EMERGENCY RESPONSE DIVISION		EPA PM JOHN SHAW	FIGURE 2
In Association with ICF Technology Inc., C.C. Johnson & Associates, Inc., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.		TAT PM MICHAEL MENTZEL	SAMPLE LOCATIONS

DATE MARCH 18, 1988

SITE NAME IMS NEWARK · TEMPERATURE (°F avg.) 39° F

SAMPLED BY E. DiSANTO HUMIDITY (%) _____

WIND DIRECTION FROM WEST BAROMETRIC PRESSURE _____

SAMPLE NO.	LOCATION	PUMP ID NO.	START TIME	START READING	STOP TIME	STOP READING
31888-1	2ND FLOOR QUAD C	ASP 61	1125	2.0	1530	2.0
31888-2	BLANK					

COMMENTS (RAIN, DAMAGED PUMP, ETC.) Sample is being taken with vacuum cleaners running around it.

2.3 SAMPLING AND ANALYSIS DATA/CHAIN OF CUSTODY

2.3 SAMPLING — . .

See Job files in the office of RAB, USEPA EDISON, NJ for remaining analyses

COMPLETED ANALYSIS REPORT

REPORT DATE: 87/12/07

PROJECT NO: 279

PROJECT NAME: TMS NEWARK

EXPLANATIONS OF REMARK CODES

REMARK CODE	EXPLANATION
B	RESULTS BASED UPON COLONY COUNTS OUTSIDE ACCEPTABLE RANGE
J	ESTIMATED VALUE
K	ACTUAL VALUE KNOWN TO BE LESS THAN VALUE GIVEN
L	ACTUAL VALUE KNOWN TO BE GREATER THAN VALUE GIVEN
U	PRESENCE OF MATERIAL VERIFIED BUT NOT QUANTITATED
O	SAMPLED BUT NOT ANALYZED DUE TO LAB ACCIDENT
T	REPORTED VALUE LESS THAN CRITERIA OF DETECTION
U	MATERIAL ANALYZED FOR, BUT NOT DETECTED

LOCATION CODES FOR IDENTIFICATION OF SAMPLING POINTS AT INDUSTRIAL / SANITARY FACILITIES, LANDFILLS, HAZARDOUS WASTE SITES.

CODE NUMBERS	SAMPLING POINTS
1001 - 1050	EFFLUENT PIPE NUMBER 001 TO 050
1051 - 1099	OTHER EFFLUENTS SUCH AS COOLING TOWER DISCHARGE, DISCHARGE FROM HOLDING PONDS, ETC...
1100 - 1249	IN PLANT SAMPLES - DURING PROCESS
1250 - 1274	IN PLANT SAMPLES AFTER PROCESS AND BEFORE TREATMENT OR DISCHARGE
1275 - 1424	IN PLANT SAMPLES - DURING TREATMENT
1425 - 1464	SEPARATE INFLUENT POINTS/WATER SOURCES
15XX	INFLUENT ASSOCIATED WITH EFFLUENT 10XX
2000	BLANK FOR VOLATILE ORGANICS
2XXX	AUTO SAMPLER BLANK AT SAMPLE POSITION 1XXX
3000 - 3099	GROUND WATER FROM WELL 00 TO 99
3100 - 3199	SEDIMENT SAMPLE (WATER BOTTOM)
3200 - 3299	SOIL SAMPLE
3300 - 3399	STREAM WATER SAMPLE
3400 - 3499	LAGOON SAMPLE
3500 - 3599	STORAGE TANK SAMPLE
3600 - 3699	LEACHATE SAMPLE
3700 - 3799	OTHER TYPE SAMPLE

COMPLETED ANALYSIS REPORT

REPORT DATE: 87/12/0

PROJECT NO: 279

PROJECT NAME: INS NEWARK

STATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE	REMARK
S	87/10/28	1000							
LOCATION CODE: 3700 SUBSTRATE: SOIL									
DESCRIPTION: COMPOSITE SOIL SAMPLE TO 2" DEPTH TAKEN F/3 POINTS IN AREA 1									
			891216	00721	CYANIDE	S	MG/KG	SEDIMENT	0.6	M
				01078	SILVER	S	MG/KG	SEDIMENT	15	
				01003	ARSENIC		MG/KG	SEDIMENT	4.0	
				01013	BERYLLIUM	S	MG/KG	SEDIMENT	67	
				01028	CADMIUM	S	MG/KG	SEDIMENT	1	M
				01029	CHROMIUM	S	MG/KG	SEDIMENT	280	
				01043	COPPER	S	MG/KG	SEDIMENT	110	
				71921	MERCURY	S	MG/KG	SEDIMENT	.63	
				01052	LEAD	S	MG/KG	SEDIMENT	272	
				01068	NICKEL	S	MG/KG	SEDIMENT	47	
				01098	ANTIMONY	S	MG/KG	SEDIMENT	.1	U
				01148	SELENIUM	S	MG/KG	SEDIMENT	.7	
				34480	THALLIUM	S	MG/KG	SEDIMENT	.1	U
				01093	ZINC	S	MG/KG	SEDIMENT	500	
				99901	ARSENIC	M	MG/L	TOTAL	.006	
				99902	BARIUM	M	MG/L	TOTAL	.31	
				99903	CADMIUM	M	MG/L	TOTAL	.02	U
				99904	CHROMIUM	M	MG/L	TOTAL	.05	U
				99906	LEAD	M	MG/L	TOTAL	.03	U
				99905	MERCURY	M	MG/L	TOTAL	.007	M
				99907	SELENIUM	M	MG/L	TOTAL	.002	M
				99900	SILVER	M	MG/L	TOTAL	.04	U
S	87/10/28	1020								
LOCATION CODE: 3700 SUBSTRATE: SOIL										
DESCRIPTION: COMPOSITE SOIL SAMPLE TO 2" DEPTH TAKEN F/3 POINTS IN AREA 2										
			891217	00721	CYANIDE	S	MG/KG	SEDIMENT	0.54	M
				01078	SILVER	S	MG/KG	SEDIMENT	27	
				01003	ARSENIC		MG/KG	SEDIMENT	3.4	
				01013	BERYLLIUM	S	MG/KG	SEDIMENT	51	
				01028	CADMIUM	S	MG/KG	SEDIMENT	2	
				01029	CHROMIUM	S	MG/KG	SEDIMENT	99	
				01043	COPPER	S	MG/KG	SEDIMENT	110	
				71921	MERCURY	S	MG/KG	SEDIMENT	.02	
				01052	LEAD	S	MG/KG	SEDIMENT	200	
				01068	NICKEL	S	MG/KG	SEDIMENT	30	
				01098	ANTIMONY	S	MG/KG	SEDIMENT	.1	
				01148	SELENIUM	S	MG/KG	SEDIMENT	.2	
				34480	THALLIUM	S	MG/KG	SEDIMENT	.1	
				01093	ZINC	S	MG/KG	SEDIMENT	370	

COMPLETED ANALYSIS REPORT

REPORT DATE: 87/12/

COMPLETED ANALYSIS REPORT

REPORT DATE: 87/12/01

PROJECT NO: 279 PROJECT NAME: IMS NEWARK

STATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME		UNITS	CHEMISTRY	VALUE & REMARK
			091317	00001	ARSENIC	W	UG/L	TOTAL	.004 M
				99902	BARIUM	W	MG/L	TOTAL	.22
				99903	CADMIUM	W	MG/L	TOTAL	.02 U
				99904	CHROMIUM	W	MG/L	TOTAL	.05 U
				99906	LEAD	W	MG/L	TOTAL	.03 U
				99905	MERCURY	W	MG/L	TOTAL	.005 M
				99907	SELENIUM	W	MG/L	TOTAL	.007
				99900	SILVER	W	MG/L	TOTAL	.04 U
S	87/10/28	1120							
LOCATION CODE: 3700 SUBSTRATE: SOIL									
DESCRIPTION: COMPOSITE SOIL SAMPLE TO 2" DEPTH									
TAKEN F/3 POINTS IN AREA 3									
			091318	00721	CYANIDE	S	MG/KG	SEDIMENT	0.63 U
				01078	SILVER	S	MG/KG	SEDIMENT	35
				01003	ARSENIC		MG/KG	SEDIMENT	14
				01013	BERYLLIUM	S	MG/KG	SEDIMENT	56
				01018	CADMIUM	S	MG/KG	SEDIMENT	2.7
				01029	CHROMIUM	S	MG/KG	SEDIMENT	140
				01043	COPPER	S	MG/KG	SEDIMENT	990 J
				71921	MERCURY	S	MG/KG	SEDIMENT	2.6
				01052	LEAD	S	MG/KG	SEDIMENT	570
				01068	NICKEL	S	MG/KG	SEDIMENT	43
				01098	ANTIMONY	S	MG/KG	SEDIMENT	.1 U
				01145	SELENIUM	S	MG/KG	SEDIMENT	.5 M
				01059	THALLIUM	S	MG/KG	SEDIMENT	.1 U
				01093	ZINC	S	MG/KG	SEDIMENT	680 J
				99901	ARSENIC	W	UG/L	TOTAL	.001 M
				99902	BARIUM	W	MG/L	TOTAL	.63
				99903	CADMIUM	W	MG/L	TOTAL	.02 U
				99904	CHROMIUM	W	MG/L	TOTAL	.05 U
				99906	LEAD	W	MG/L	TOTAL	.03 U
				99905	MERCURY	W	MG/L	TOTAL	.0002 U
				99907	SELENIUM	W	MG/L	TOTAL	.001 M
				99900	SILVER	W	MG/L	TOTAL	.04 U
S	87/10/28	1135							
LOCATION CODE: 3700 SUBSTRATE: SOIL									
DESCRIPTION: COMPOSITE SOIL SAMPLE TO 2" DEPTH									
TAKEN F/3 POINTS IN AREA 4									
			091319	00721	CYANIDE	S	MG/KG	SEDIMENT	0.74 M

COMPLETED ANALYSIS REPORT

REPORT DATE: 97/12/07

PROJECT NO: 279 PROJECT NAME: INS NEWARK

STATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME		UNITS	CHEMISTRY	VALUE & REMARK
			931313	01070	SILVER	S	MG/KG	SEDIMENT	11
				01003	ARSENIC		MG/KG	SEDIMENT	2.1
				01013	BERYLLIUM	S	MG/KG	SEDIMENT	21
				01028	CADMIUM	S	MG/KG	SEDIMENT	2.2
				01029	CHROMIUM	S	MG/KG	SEDIMENT	21
				01043	COPPER	S	MG/KG	SEDIMENT	69
				71921	MERCURY	S	MG/KG	SEDIMENT	5.4
				01052	LEAD	S	MG/KG	SEDIMENT	190
				01060	NICKEL	S	MG/KG	SEDIMENT	24
				01098	ANTIMONY	S	MG/KG	SEDIMENT	.1 U
				01148	SELENIUM	S	MG/KG	SEDIMENT	.3 U
				34480	THALLIUM	S	MG/KG	SEDIMENT	.1 U
				01093	ZINC	S	MG/KG	SEDIMENT	300 J
				99901	ARSENIC	M	MG/L	TOTAL	.019
				99902	BARIUM	M	MG/L	TOTAL	.69
				99903	CADMIUM	M	MG/L	TOTAL	.02 U
				99904	CHROMIUM	M	MG/L	TOTAL	.05 U
				99906	LEAD	M	MG/L	TOTAL	.03 U
				99905	MERCURY	M	MG/L	TOTAL	.0002 U
				99907	SELENIUM	M	MG/L	TOTAL	.003 U
				99908	SILVER	M	MG/L	TOTAL	.04 U

***** END OF PROJECT *****

T. Tse

COMPLETED ANALYSIS REPORT

REPORT DATE: 88/01/21

PROJECT NO: 279

PROJECT NAME: I-95 - NEWARK

EXPLANATIONS OF REMARK CODES

REMARK CODE	EXPLANATION
E	RESULTS BASED UPON COLONY COUNTS OUTSIDE ACCEPTABLE RANGE
J	ESTIMATED VALUE
K	ACTUAL VALUE KNOWN TO BE LESS THAN VALUE GIVEN
L	ACTUAL VALUE KNOWN TO BE GREATER THAN VALUE GIVEN
M	PRESENCE OF MATERIAL VERIFIED BUT NOT QUANTIFIED
O	SAMPLED BUT NOT ANALYZED DUE TO LAB ACCIDENT
T	REPORTED VALUE LESS THAN CRITERIA OF DETECTION
U	MATERIAL ANALYZED FOR, BUT NOT DETECTED

LOCATION CODES FOR IDENTIFICATION OF SAMPLING POINTS AT INDUSTRIAL / SANITARY FACILITIES, LANDFILLS, HAZARDOUS WASTE SITES.

CODE NUMBERS	SAMPLING POINTS
1001 - 1050	EFFLUENT PIPE NUMBER 001 TO 050
1051 - 1099	OTHER EFFLUENTS SUCH AS COOLING TOWER DISCHARGE, DISCHARGE FROM HOLDING PONDS, ETC...
1100 - 1249	IN PLANT SAMPLES - DURING PROCESS
1250 - 1274	IN PLANT SAMPLES AFTER PROCESS AND BEFORE TREATMENT OR DISCHARGE
1275 - 1424	IN PLANT SAMPLES - DURING TREATMENT
1425 - 1454	SEPARATE INFLUENT POINTS/WATER SOURCES
15XX	INFLUENT ASSOCIATED WITH EFFLUENT 10XX
2000	BLANK FOR VOLATILE ORGANICS
2XXX	AUTO SAMPLER BLANK AT SAMPLE POSITION 1XXX
3000 - 3099	GROUND WATER FROM WELL 01 TO 99
3100 - 3199	SEDIMENT SAMPLE (WATER BOTTOM)
3200 - 3299	SOIL SAMPLE
3300 - 3399	STREAM WATER SAMPLE
3400 - 3499	LAGOON SAMPLE
3500 - 3599	STORAGE TANK SAMPLE
3600 - 3699	LEACHATE SAMPLE
3700 - 3799	OTHER TYPE SAMPLE

COMPLETED ANALYSIS REPORT

REPORT DATE: 88/01/21

PROJECT NO: 278

PROJECT NAME: IMS - NEWARK

STATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME		UNITS	CHEMISTRY	VALUE & REMARK
IMS	87/10/2:	1000							
LOCATION CODE: 3700 SUBSTRATE: SOIL									
DESCRIPTION: COMPOSITE SOIL SAMPLE TO 2" DEPTH									
TAKEN 5/3 POINTS IN AREA 1									
			091316	39333	ALDRIN	S	UG/KG	SEDIMENT	U
				39383	DIELDRIN	S	UG/KG	SEDIMENT	U
				39351	CHLORDANE	S	UG/KG	SEDIMENT	U
				39301	4,4'-DDT	S	UG/KG	SEDIMENT	U
				39321	4,4'-DDE	S	UG/KG	SEDIMENT	U
				39311	4,4'-DDD	S	UG/KG	SEDIMENT	U
				34364	ALPHA ENDOSULFAN	S	UG/KG	SEDIMENT	U
				34359	BETA ENDOSULFAN	S	UG/KG	SEDIMENT	U
				34354	ENDOSULFAN SULFATE	S	UG/KG	SEDIMENT	U
				39393	ENDRIN	S	UG/KG	SEDIMENT	U
				34369	ENDRIN ALDEHYDE	S	UG/KG	SEDIMENT	U
				39413	HEPTACLOR	S	UG/KG	SEDIMENT	U
				39423	HEPTACHLOR EPOXIDE	S	UG/KG	SEDIMENT	U
				39076	ALPHA-BHC	S	UG/KG	SEDIMENT	U
				34257	BETA-BHC	S	UG/KG	SEDIMENT	U
				34257	GAMMA-BHC		UG/KG	SEDIMENT	U
				34257	BETA-BHC	S	UG/KG	SEDIMENT	U
				39403	TOXAPHENE	S	UG/KG	SEDIMENT	U
				99922	PCB-1016	M	UG/KG		U
				99923	PCB-1221	M	UG/KG		U
				99924	PCB-1232	M	UG/KG		U
				99925	PCB-1242	M	UG/KG		U
				99926	PCB-1248	M	UG/KG		U
				99927	PCB-1254	M	UG/KG		U
				99928	PCB-1260	M	UG/KG		U
IMS	87/10/2:	1020							
LOCATION CODE: 3700 SUBSTRATE: SOIL									
DESCRIPTION: COMPOSITE SOIL SAMPLE TO 2" DEPTH									
TAKEN 5/3 POINTS IN AREA 1									
			091317	39333	ALDRIN	S	UG/KG	SEDIMENT	U
				39383	DIELDRIN	S	UG/KG	SEDIMENT	U
				39351	CHLORDANE	S	UG/KG	SEDIMENT	U
				39301	4,4'-DDT	S	UG/KG	SEDIMENT	U
				39321	4,4'-DDE	S	UG/KG	SEDIMENT	U
				39311	4,4'-DDD	S	UG/KG	SEDIMENT	U
				34364	ALPHA ENDOSULFAN	S	UG/KG	SEDIMENT	U
				34359	BETA ENDOSULFAN	S	UG/KG	SEDIMENT	U
				34354	ENDOSULFAN SULFATE	S	UG/KG	SEDIMENT	U
				39393	ENDRIN	S	UG/KG	SEDIMENT	U
				34369	ENDRIN ALDEHYDE	S	UG/KG	SEDIMENT	U

COMPLETED ANALYSIS REPORT — REPORT DATE: 88/01/21

PROJECT NO: 278 — PROJECT NAME: IMS - NEWARK

STATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME		UNITS	CHEMISTRY	VALUE & REMARK
			091317	39413	HEPTACLOR	S	UG/KG	SEDIMENT	U
				39423	HEPTACHLOR EPOXIDE	S	UG/KG	SEDIMENT	U
				39076	ALPHA-BHC	S	UG/KG	SEDIMENT	U
				34257	BETA-BHC	S	UG/KG	SEDIMENT	U
				34257	GAMMA-BHC		UG/KG	SEDIMENT	U
				34257	BETA-BHC	S	UG/KG	SEDIMENT	U
				39403	TOXAPHENE	S	UG/KG	SEDIMENT	U
				99922	PCB-1016	M	UG/KG		U
				99923	PCB-1221	M	UG/KG		U
				99924	PCB-1232	M	UG/KG		U
				99925	PCB-1242	M	UG/KG		U
				99926	PCB-1248	M	UG/KG		U
				99927	PCB-1254	M	UG/KG		U
				99928	PCB-1260	M	UG/KG		U
IMS	87/10/28	1120							
LOCATION CODE: 3700 SUBSTRATE: SOIL									
DESCRIPTION: COMPOSITE SOIL SAMPLE TO 2" DEPTH									
TAKEN F/3 POINTS IN AREA 3									
			091314	39333	ALDRIN	S	UG/KG	SEDIMENT	U
				39383	DIELDRIN	S	UG/KG	SEDIMENT	U
				39351	CHLORDANE	S	UG/KG	SEDIMENT	U
				39301	4,4'-DDT	S	UG/KG	SEDIMENT	U
				39321	4,4'-DDE	S	UG/KG	SEDIMENT	U
				39311	4,4'-DDD	S	UG/KG	SEDIMENT	U
				34364	ALPHA ENDOSULFAN	S	UG/KG	SEDIMENT	U
				34359	BETA ENDOSULFAN	S	UG/KG	SEDIMENT	U
				34354	ENDOSULFAN SULFATE	S	UG/KG	SEDIMENT	U
				39393	ENDRIN	S	UG/KG	SEDIMENT	U
				34369	ENDRIN ALDEHYDE	S	UG/KG	SEDIMENT	U
				39413	HEPTACLOR	S	UG/KG	SEDIMENT	U
				39423	HEPTACHLOR EPOXIDE	S	UG/KG	SEDIMENT	U
				39076	ALPHA-BHC	S	UG/KG	SEDIMENT	U
				34257	BETA-BHC	S	UG/KG	SEDIMENT	U
				34257	GAMMA-BHC		UG/KG	SEDIMENT	U
				34257	BETA-BHC	S	UG/KG	SEDIMENT	U
				39403	TOXAPHENE	S	UG/KG	SEDIMENT	U
				99922	PCB-1016	M	UG/KG		U
				99923	PCB-1221	M	UG/KG		U
				99924	PCB-1232	M	UG/KG		U
				99925	PCB-1242	M	UG/KG		U

COMPLETED ANALYSIS REPORT

REPORT DATE: 88/01/21

PROJECT NO: 278

PROJECT NAME: IMS - NEWARK

STATION NO	DATE FROM-TO	TIME OF-DAY	LABNO	PARNO	PARAMETER NAME		UNITS	CHEMISTRY	VALUE & REMARK
			091319	99926	PCB-1248	M	UG/KG		U
				99927	PCB-1254	M	UG/KG		U
				99928	PCB-1260	M	UG/KG		U
IMS	87/10/28	1135							
LOCATION CODE: 3700 SUBSTRATE: SOIL									
DESCRIPTION: COMPOSITE SOIL SAMPLE TO 2" DEPTH TAKEN F/3 POINTS IN AREA 4									
			091319	39333	ALDRIN	S	UG/KG	SEDIMENT	U
				39383	DIELDRIN	S	UG/KG	SEDIMENT	U
				39351	CHLORDANE	S	UG/KG	SEDIMENT	U
				39301	4,4'-DDT	S	UG/KG	SEDIMENT	U
				39321	4,4'-DDE	S	UG/KG	SEDIMENT	U
				39311	4,4'-DDD	S	UG/KG	SEDIMENT	U
				34364	ALPHA-ENDOSULFAN	S	UG/KG	SEDIMENT	U
				34359	BETA-ENDOSULFAN	S	UG/KG	SEDIMENT	U
				34354	ENDOSULFAN SULFATE	S	UG/KG	SEDIMENT	U
				39393	ENDRIN	S	UG/KG	SEDIMENT	U
				34369	ENDRIN ALDEHYDE	S	UG/KG	SEDIMENT	U
				39413	HEPTACLOR	S	UG/KG	SEDIMENT	U
				39423	HEPTACHLOR EPOXIDE	S	UG/KG	SEDIMENT	U
				39076	ALPHA-BHC	S	UG/KG	SEDIMENT	U
				34257	BETA-BHC	S	UG/KG	SEDIMENT	U
				34257	GAMMA-BHC		UG/KG	SEDIMENT	U
				34257	BETA-BHC	S	UG/KG	SEDIMENT	U
				39403	TOXAPHENE	S	UG/KG	SEDIMENT	U
				99922	PCB-1016	M	UG/KG		U
				99923	PCB-1221	M	UG/KG		U
				99924	PCB-1232	M	UG/KG		U
				99925	PCB-1242	M	UG/KG		U
				99926	PCB-1248	M	UG/KG		U
				99927	PCB-1254	M	UG/KG		U
				99928	PCB-1260	M	UG/KG		U

***** END OF PROJECT ***** T. Tillis

Laboratory Name York Labs

Case No SAS 3551 B

Sample Number
3551B-01

Organics Analysis Data Sheet
(Page 3)

00011

Pesticide/PCBs

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 1/7/88

Date Analyzed: 1/12/88

Conc/Dil Factor: 1.0

Percent Moisture (decanted) NA

GPC Cleanup ☐Yes ☐No

Separatory Funnel Extraction ☐Yes

Continuous Liquid - Liquid Extraction ☐Yes

CAS Number		(KC) mg/L ug/L or ug/Kg (Circle One)
319-84-6	Alpha-BHC	NR
319-85-7	Beta-BHC	↓
319-86-8	Delta-BHC	↓
58-89-9	Gamma-BHC (Lindane)	.01U
76-44-8	Heptachlor	NR
309-00-2	Aldrin	↓
1024-57-3	Heptachlor Epoxide	↓
959-98-8	Endosulfan I	↓
60-57-1	Dieldrin	↓
72-55-9	4,4'-DDE	↓
72-20-8	Endrin	.001U
33213-65-9	Endosulfan II	NR
72-54-8	4,4'-DDD	↓
1031-07-8	Endosulfan Sulfate	↓
50-29-3	4,4'-DDT	↓
72-43-5	Methoxychlor	.50U
53494-70-5	Endrin Ketone	NR
57-74-9	Chlordane	↓
8001-35-2	Toxaphene	.10U
12674-11-2	Aroclor-1016	NR
11104-28-2	Aroclor-1221	↓
11141-16-5	Aroclor-1232	↓
53469-21-9	Aroclor-1242	↓
12672-29-6	Aroclor-1248	↓
11097-69-1	Aroclor-1254	↓
11096-82-5	Aroclor-1260	↓

PRELIMINARY DATA SUBJECT TO REVISION AFTER QUALITY ASSURANCE REVIEW

V_i = Volume of extract injected (ul)

V_s = Volume of water extracted (ml)

W_s = Weight of sample extracted (g)

V_t = Volume of total extract (ul)

V_s 100. or W_s _____ V_t 5000. V_i 2.0

00012

Laboratory Name York Labs

Case No SAS 3551B

Sample Number
3551B-01

Organics Analysis Data Sheet

Herbicides - EPTOX

Date Extracted / Prepared 1/8/88
Date Analyzed 1/14/88
Conc / Dil Factor 1.0
Percent Moisture (decanted N/A

GPC Cleanup ☐ Yes ☐ No
Separatory Funnel Extraction ☑ Yes
Cont. L/L Ext. ☐ Yes

PRELIMINARY DATA
SUBJECT TO REVISION AFTER
QUALITY ASSURANCE REVIEW

	mg/L
2,4 D	0.10u
Silvex	0.01u

V_i = Volume of extract injected (uL)
V_s = Volume of water extracted (mL)
W_s = Weight of sample extracted (G)
V_t = Volume of total extract (uL)

V_s 100mL or W_s _____ V_t 2000 V_i 2.0

Laboratory Name York Labs

Case No SAS 3551 B

Sample Number 3551 B-02

Organics Analysis Data Sheet
(Page 3)

00018

Pesticide/PCBs

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 1/7/88

Date Analyzed: 1/12/88

Conc/Dil Factor: 1.0

Percent Moisture (decanted): NA

GPC Cleanup ☐Yes ☐No

Separatory Funnel Extraction ☐Yes

Continuous Liquid - Liquid Extraction ☐Yes

CAS Number		(ug/L) or ug/Kg (Circle One) mg/L
319-84-6	Alpha-BHC	NR
319-85-7	Beta-BHC	
319-86-8	Delta-BHC	
58-89-9	Gamma-BHC (Lindane)	.01 u
76-44-8	Heptachlor	NR
309-00-2	Aldrin	
1024-57-3	Heptachlor Epoxide	
959-98-8	Endosulfan I	
60-57-1	Dieldrin	
72-55-9	4, 4'-DDE	
72-20-8	Endrin	.001 u
33213-65-9	Endosulfan II	NR
72-54-8	4, 4'-DDD	
1031-07-8	Endosulfan Sulfate	
50-29-3	4, 4'-DDT	
72-43-5	Methoxychlor	.50 u
53494-70-5	Endrin Ketone	NR
57-74-9	Chlordane	
8001-35-2	Toxaphene	[illegible]
12674-11-2	Aroclor-1016	NR
11104-28-2	Aroclor-1221	
11141-16-5	Aroclor-1232	
53469-21-9	Aroclor-1242	
12672-29-6	Aroclor-1248	
11097-69-1	Aroclor-1254	
11096-82-5	Aroclor-1260	

V_i = Volume of extract injected (ul)

V_s = Volume of water extracted (ml)

W_s = Weight of sample extracted (g)

V_t = Volume of total extract (ul)

V_s 100. or W_s ______ V_t 5000. V_i 2.0

00019

Laboratory Name York Labs

Case No SAS 3551B

Sample Number
3551B-02

Organics Analysis Data Sheet

Herbicides - EPTOX

Date Extracted / Prepared 1/8/88
Date Analyzed 1/14/88
Conc / Dil Factor 1.0
Percent Moisture (decanted) N/A

GPC Cleanup ☐ Yes ☐ No
Separatory Funnel Extraction ☑ Yes
Cont. L/L Ext. ☐ Yes

	mg/L
2,4 D	
Silvex	0.01

PRELIMINARY DATA SUBJECT TO REVISION AFTER QUALITY ASSURANCE REVIEW

V_i = Volume of extract injected (uL)
V_s = Volume of water extracted (mL)
W_s = Weight of sample extracted (g)
V_t = Volume of total extract (uL)

V_s 100mL or W_s _____ V_t 2000 V_i 2.0

Laboratory Name York Labs

Case No SAS 3551 B

Sample Number: Method Blank

Organics Analysis Data Sheet
(Page 3)

Pesticide/PCBs

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 1/7/88

Date Analyzed: 1/12/88

Conc/Dil Factor: 1.0

Percent Moisture (decanted) NA

GPC Cleanup ☐Yes ☐No

Separatory Funnel Extraction ☐Yes

Continuous Liquid - Liquid Extraction ☐Yes

CAS Number		KC ug/l or ug/Kg (Circle One) mg/l
319-84-6	Alpha-BHC	NR
319-85-7	Beta-BHC	↓
319-86-8	Delta-BHC	↓
58-89-9	Gamma-BHC (Lindane)	.01 U
76-44-8	Heptachlor	NR
309-00-2	Aldrin	↓
1024-57-3	Heptachlor Epoxide	↓
959-98-8	Endosulfan I	↓
60-57-1	Dieldrin	↓
72-55-9	4,4'-DDE	↓
72-20-8	Endrin	.001 U
33213-65-9	Endosulfan II	NR
72-54-8	4,4'-DDD	↓
1031-07-8	Endosulfan Sulfate	↓
50-29-3	4,4'-DDT	↓
72-43-5	Methoxychlor	.50 U
53494-70-5	Endrin Ketone	NR
57-74-9	Chlordane	↓
8001-35-2	Toxaphene	1.0 U
12674-11-2	Aroclor-1016	NR
11104-28-2	Aroclor-1221	↓
11141-16-5	Aroclor-1232	↓
53469-21-9	Aroclor-1242	↓
12672-29-6	Aroclor-1248	↓
11097-69-1	Aroclor-1254	↓
11096-82-5	Aroclor-1260	↓

V_t = Volume of extract injected (ul)

V_s = Volume of water extracted (ml)

W_s = Weight of sample extracted (g)

V_t = Volume of total extract (ul)

V_s 300. or W_s _____ V_t 5000. V_i 2.0

00079

Laboratory Name York Labs

Case No SAS 3551B

Sample Number: Method Blank

Organics Analysis Data Sheet

Herbicides - EPTOX

Date Extracted / Prepared 1/8/88
Date Analyzed 1/14/88
Conc / Dil Factor 1.0
Percent Moisture (decanted) N/A

GPC Cleanup ☐ Yes ☐ No
Separatory Funnel Extraction ☑ Yes
Cont. L/L Ext. ☐ Yes

2,4 D	mg/L	0.10 U
Silvex		0.01 U

PRELIMINARY DATA SUBJECT TO REVISION AFTER QUALITY ASSURANCE REVIEW

V_i = Volume of extract injected (mL)
V_s = Volume of water extracted (mL)
W_s = Weight of sample extracted (g)
V_t = Volume of total extract (uL)

V_s 100mL or W_s _____ V_t 2000 V_i 2.0

Laboratory Name York Labs

Case No SAS 3551 B

Sample Number EPTOX Prep. Blank

Organics Analysis Data Sheet
(Page 3)

00082

Pesticide/PCBs

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 1/7/88

Date Analyzed: 1/13/88

Conc/Dil Factor: 1.0

Percent Moisture (decanted) NA

GPC Cleanup ☐Yes ☐No

Separatory Funnel Extraction ☐Yes

Continuous Liquid - Liquid Extraction ☐Yes

KC 1116 ug/L or ug/Kg mg/L (Circle One)

CAS Number		
319-84-6	Alpha-BHC	NR
319-85-7	Beta-BHC	↓
319-86-8	Delta-BHC	↓
58-89-9	Gamma-BHC (Lindane)	.01U
76-44-8	Heptachlor	NR
309-00-2	Aldrin	↓
1024-57-3	Heptachlor Epoxide	↓
959-98-8	Endosulfan I	↓
60-57-1	Dieldrin	↓
72-55-9	4,4'-DDE	↓
72-20-8	Endrin	.001U
33213-65-9	Endosulfan II	NR
72-54-8	4,4'-DDD	↓
1031-07-8	Endosulfan Sulfate	↓
50-29-3	4,4'-DDT	↓
72-43-5	Methoxychlor	.50U
53494-70-5	Endrin Ketone	NR
57-74-9	Chlordane	↓
8001-35-2	Toxaphene	.5.0U
12674-11-2	Aroclor-1016	NR
11104-28-2	Aroclor-1221	↓
11141-16-5	Aroclor-1232	↓
53469-21-9	Aroclor-1242	↓
12672-29-6	Aroclor-1248	↓
11097-69-1	Aroclor-1254	↓
11096-82-5	Aroclor-1260	↓

V_i = Volume of extract injected (ul)

V_s = Volume of water extracted (ml)

W_s = Weight of sample extracted (g)

V_t = Volume of total extract (ul)

V_s 100. or W_s _____ V_t 5000. V_i 2.0

00083

Laboratory Name York Labs

Case No SAS 3551B

Sample Number
EPTOX Prep Blank

Organics Analysis Data Sheet

Herbicides - EPTOX

Date Extracted / Prepared 1/8/88
Date Analyzed 1/14/88
Conc / Dil Factor 1.0
Percent Moisture (decanted N/A

GPC Cleanup ☐ Yes ☐ No
Separatory Funnel Extraction ☑ Yes
Cont. L/L Ext. ☐ Yes

PRELIMINARY DATA SUBJECT TO REVISION AFTER QUALITY ASSURANCE REVIEW

	mg/kg
2,4 D	0.100
Silvex	0.01U

V_i = Volume of extract injected (uL)
V_s = Volume of water extracted (mL)
W_s = Weight of sample extracted (g)
V_t = Volume of total extract (uL)

V_s 100mL or W_s _____ V_t 2000 V_i 2.0

Form 1

Sample No.
3551B-01

00104

Date 1-19-88

INORGANIC ANALYSIS DATA SHEET

LAB NAME YORK LABS

CASE NO. 3551B

Lab Receipt Date 12-28-87

LAB SAMPLE ID. NO. 0366-001

QC REPORT NO. _____

Elements Identified and Measured

Matrix: Water V * Soil _____ Sludge _____ Other _____

(ug/L) or mg/kg dry weight (Circle One)

1.	Aluminum	13.	Magnesium
2.	Antimony	14.	Manganese
3.	Arsenic 1000 U P	15.	Mercury 2.0 U CV
4.	Barium 734 P	16.	Nickel
5.	Beryllium	17.	Potassium
6.	Cadmium 20 U N P	18.	Selenium 500 U P
7.	Calcium	19.	Silver 20 U P
8.	Chromium 33 P	20.	Sodium
9.	Cobalt	21.	Thallium
10.	Copper	22.	Vanadium
11.	Iron	23.	Zinc
12.	Lead 200 U P		Precent Solids
	Cyanide		

SUBJECT TO REVISION AFTER QUALITY ASSURANCE REVIEW

Comments: * EP TOXICITY LEACHATE.

Lab Manager _____

Revision 0
Date September 1986

Form I

Sample No.
3551B-01DUP

00105

Date 1-19-88

INORGANIC ANALYSIS DATA SHEET

LAB NAME YORK LABS

CASE NO. 3551B

Lab Receipt Date 12-28-87

LAB SAMPLE ID. NO. 0366-001DUP

QC REPORT NO. _____

Elements Identified and Measured

Matrix: Water ✓* Soil _____ Sludge _____ Other _____

(ug/L) or mg/kg dry weight (Circle One)

1. Aluminum		13. Magnesium	
2. Antimony		14. Manganese	
3. Arsenic	1000 U P	15. Mercury	2.0 U CV
4. Barium	778 P	16. Nickel	
5. Beryllium		17. Potassium	
6. Cadmium	20 U N P	18. Selenium	500 U P
7. Calcium		19. Silver	20 U P
8. Chromium	25 P	20. Sodium	
9. Cobalt		21. Thallium	
10. Copper		22. Vanadium	
11. Iron		23. Zinc	
12. Lead	200 U P	Precent Solids (%)	
Cyanide			

Comments: *EP TOXICITY LEACHATE

Lab Manager _____

Revision 0
Date September 1986

Form 1

00106

Sample No.
3551B-02

Date 1-19-88

INORGANIC ANALYSIS DATA SHEET

LAB NAME YORK LABS

CASE NO. 3551B

Lab Receipt Date 12-28-87

LAB SAMPLE ID. NO. 0366-002

QC REPORT NO. _____

Elements Identified and Measured

Matrix: Water ✓* Soil _____ Sludge _____ Other _____

(ug/L) or mg/kg dry weight (Circle One)

1. Aluminum		13. Magnesium	
2. Antimony		14. Manganese	
3. Arsenic	1000 U P	15. Mercury	2.0 U
4. Barium	689	16. Nickel	
5. Beryllium		17. Potassium	
6. Cadmium	20 U	18. Selenium	500 U P
7. Calcium		19. Silver	20 U P
8. Chromium	40	20. Sodium	
9. Cobalt		21. Thallium	
10. Copper		22. Vanadium	
11. Iron		23. Zinc	
12. Lead	200 U	Precent Solids (%)	

Cyanide _____

Comments: *EPTOXICITY LEACHATE

Lab Manager _____

Revision 0
Date September 1986

Form III

Q. C. Report No. _____

00109

BLANKS

LAB NAME YORK LABS CASE NO. 3551B

DATE 1-19-88 UNITS UG/L

Compound	Initial Calibration Blank Value	Continuing Calibration Blank Value 1	2	3	4	Preparation Blank Matrix: WATER 1	Matrix: 2
Metals:							
1. Aluminum							
2. Antimony							
3. Arsenic	1000U	1000U	1000U			1000U	
4. Barium	200U	200U	200U			200U	
5. Beryllium							
6. Cadmium	20U	20U	20U			20U	
7. Calcium							
8. Chromium	20U	20U	20U			20U	
9. Cobalt							
10. Copper							
11. Iron							
12. Lead	200U	200U	200U			200U	
13. Magnesium							
14. Manganese							
15. Mercury	0.2U	0.2U				2.0U	
16. Nickel							
17. Potassium							
18. Selenium	500U	500U	500U			500U	
19. Silver	20U	20U	20U			20U	
20. Sodium							
21. Thallium							
22. Vanadium							
23. Zinc							
Other:							
Cyanide							

SUBJECT TO REVISION AFTER QUALITY ASSURANCE REVIEW

[1] Reporting Units: aqueous, ug/L; solid mg/kg

Revision 0
Date September 1986

Form VII

Q.C. Report No. _____

00114

INSTRUMENT DETECTION LIMITS AND

LABORATORY CONTROL SAMPLE

LAB NAME YORK LABS CASE NO. 3551B DATE 1-19-88

LCS NO. INORGANIC Ventures

Compound	Required Detection Limits (CRDL)-ug/l ≠	Instrument Detection Limits (IDL)-ug/l (ICP/AA) Furnace ID# G500XR ID# _____		Lab Control Sample (ug/L) mg/kg (circle one) True	Found	%R
Metals:						
1. Aluminum						
2. Antimony						
3. Arsenic	1000	130		1000	893	89
4. Barium	200	20		300	281	94
5. Beryllium						
6. Cadmium	20	20		300	302	101
7. Calcium						
8. Chromium	20	20		300	267	89
9. Cobalt						
10. Copper						
11. Iron						
12. Lead	200	200		1000	924	92
13. Magnesium						
14. Manganese						
15. Mercury	~~2.0~~ 0.2 ug/l	~~0.2~~ 0.2 ug/l		NR		
16. Nickel						
17. Potassium						
18. Selenium	500	320		500	425	85
19. Silver	20	20		300	276	92
20. Sodium						
21. Thallium						
22. Vanadium						
23. Zinc						
Other: _____						
Cyanide		NR	NR			

NR - Not required

Revision 0

Date September 1986

Title: Appendix A.3: Data Acceptability Narrative

Case# 8781-35518 Site IMS-TAT Emg. Response
Lab RMAL

A.3.1 Are all data of acceptable quality? Yes ___ No ✓

If no, list exceptions with reason(s) for rejection of qualification as estimated value (J).

① Holding Times are an allowed time reference for which a sample will be guaranteed uniformity. For Mercury in aqueous samples, the validation consideration is 26 days from the time of sampling until the time of digestion. If the holding time is exceeded, sample concentration values might indicate a low bias due to decredation. The following samples were rejected due to holding time exceedence:

Hg, Sample MBL 583 (Aqueous)

③ Preparation blanks are designed to indicate any presence of laboratory contamination that would carry over into the samples. Contamination is considered present if the concentration found in the blank exceeds 2 x IDL and the sample values are less than 10 x the prep blank value. The following samples are rejected due to prep blank contamination:

K, Samples MBL 584, 585 (soil)

③ Spike sample analysis is designed to provide information on the

KAB Reviewer: Frank J. Manni Date: 2-29-88
Signature

Verified by: Heinz Sheikh Date: 2-29-88
Signature

A.3.1 (Continuation)

effect of sample matrix on the digestion procedure and instrument performance. If the recovery on a known spike concentration is low, as it is in this case, a low bias must be considered for the respective analyte. Depending on the matrix and the % recovery, data can be considered either estimated or rejected. The following samples are considered estimated due to low spike recovery:

Sb; Cr; Pb; Mn; Zn - MBL 584-585 (soil)

④ Duplicate sample analysis is an additional measure of instrument performance. If the RPD is outside the control limits of 20% or CRDL, whichever is applicable, data may not be considered as accurate. The following data is rejected due to an RPD > 100% where the sample and duplicate are both greater than 5 x IDLs

~~Ca; Mn; Samples MBL 584-585 (soil)~~

The following data is rejected due to the difference between the sample and duplicate being greater than $2 \times \frac{\text{CRDL}}{\text{IDL}}$ where the sample and/or duplicate is less than 5 x CRDL but greater than CRDL:

Ni; V; Samples MBL 584-585 (soil)

⑤ A Laboratory control sample analysis (LCS) is designed to serve as a monitor of the efficiency of the digestion procedure. If the % recovery is not within the control limits of 80-120% for aqueous or TKM criteria for soil, data may not be considered accurate. The following data was rejected again due to a %R of 246 and a found concentration deemed to exceed reasonable limits: K; Samples MBL 585-584 (soil)

TAT/Emg. Response IMS 25

U.S. EPA - CLP

00001

COVER PAGE - INORGANIC ANALYSES DATA PACKAGE

Lab Name: ROCKY MOUNTAIN ANALYTICAL Contract: 68-01-7476

Lab Code: ENSECO Case No.: 8781 SAS No.: 35518 SDG No.: MBL584

SOW No.: 7/87

EPA Sample No.	Lab Sample ID.
MBL584	
MBL584D	
MBL584S	
MBL585	

Were ICP interelement corrections applied? Yes/No YES

Were ICP background corrections applied? Yes/No YES

If yes-were raw data generated before application of background corrections? Yes/No NO

Comments:

2 MEDIUM SOILS FOR TOTAL METALS AND CYANIDE ANALYSIS
INTERFERENCE ON SERIAL DILUTION NOTED FOR CALCIUM AND POTASSIUM
RMA QC#87569

Release of the data contained in this hardcopy data package and in the computer readable data submitted on floppy diskette have been authorized by the Laboratory Manager or the Manager's designee, as verified by the following signature.

Lab Manager: _____

Date: 01/24/88

RECEIVED FEB 01 1988 S&M BRANCH

RECEIVED FEB 01 1988 S&M BRANCH

U.S. EPA - CLP

1

INORGANIC ANALYSIS DATA SHEET

EPA SAMPLE NO.

MBL584

Lab Name: ROCKY MOUNTAIN ANALYTICAL Contract: 68-01-7476

Lab Code: ENSECO Case No.: 8781 SAS No.: 35516 SDG No.: MBL584

Matrix (soil/water): SOIL Lab Sample ID: _____

Level (low/med): ~~LOW~~ MED Date Recieved: 12/23/87

% Solids: 90.7

Concentration Units (ug/L or mg/kg dry weight): MG/KG

CAS No.	Analyte	Concentration	C	Q	M
7429-90-5	Aluminum	5960		X	P
7440-36-0	Antimony	6.8	U	N J	P
7440-38-2	Arsenic	5.5		+	F
7440-39-3	Barium	172			P
7440-41-7	Beryllium	0.22	U	X	P
7440-43-9	Cadmium	1.1	U		P
7440-70-2	Calcium	~~8800~~		E X	P
7440-47-3	Chromium	169		N X J	P
7440-48-4	Cobalt	12.3			P
7440-50-8	Copper	89.1		N	P
7439-89-6	Iron	17400		X	P
7439-92-1	Lead	232		N J	P
7439-95-4	Magnesium	5890		X	P
7439-96-5	Manganese	~~389~~		N X	P
7439-97-6	Mercury	0.3			CV
7440-02-0	Nickel	~~40.8~~		X	P
7440-09-7	Potassium	~~520~~	B	E	P
7482-49-2	Selenium	0.44	U	W N	F
7440-22-4	Silver	1.1	U		P
7440-23-5	Sodium	526	B		P
7440-28-0	Thallium	0.44	U		F
7440-62-2	Vanadium	~~25.6~~		N X	P
7440-66-6	Zinc	314		N X J	P
	Cyanide	0.55	U		AS

Color Before: BROWN Clarity Before: _____ Texture: COARSE

Color After: BROWN Clarity After: _____ Artifacts: _____

Comments:

ARSENIC VALUE DETERMINED BY MSA

U.S. EPA - CLP

00003

EPA SAMPLE NO.

1

INORGANIC ANALYSIS DATA SHEET

MBL585

Lab Name: ROCKY MOUNTAIN ANALYTICAL Contract: 68-01-7476

Lab Code: ENSECO Case No.: 8781 SAS No.: 35518 SDG No.: MBL584

Matrix (soil/water): SOIL Lab Sample ID: _____

Level (low/med): ~~LOW~~ MED Date Recieved: 12/23/87

% Solids: 84.6

Concentration Units (ug/L or mg/kg dry weight): MG/KG

CAS No.	Analyte	Concentration	C	Q	M
7429-90-5	Aluminum	6080		X	P
7440-36-0	Antimony	7.3	U	N J	P
7440-38-2	Arsenic	9.0		+	F
7440-39-3	Barium	371			P
7440-41-7	Beryllium	0.24	U	X	P
7440-43-9	Cadmium	7.3			P
7440-70-2	Calcium	~~6260~~		E X	P
7440-47-3	Chromium	248		N X J	P
7440-48-4	Cobalt	11.5	B		P
7440-50-8	Copper	171		N	P
7439-89-6	Iron	17300		X	P
7439-92-1	Lead	358		N J	P
7439-95-4	Magnesium	3810		X	P
7439-96-5	Manganese	~~350~~		N X	P
7439-97-6	Mercury	0.6			CV
7440-02-0	Nickel	~~38.5~~		X	P
7440-09-7	Potassium	~~409~~	B	E	P
7482-49-2	Selenium	0.47	U	N X	F
7440-22-4	Silver	1.2	U		P
7440-23-5	Sodium	428	B		P
7440-28-0	Thallium	0.47	U		F
7440-62-2	Vanadium	~~51.9~~		N X	P
7440-66-6	Zinc	464		N X J	P
	Cyanide	6.3			AS

Color Before: BROWN Clarity Before: _____ Texture: COARSE

Color After: BROWN Clarity After: _____ Artifacts: _____

Comments:

ARSENIC VALUE DETERMINED BY MSA

U.S. EPA - CLP

IMS W

00001

COVER PAGE - INORGANIC ANALYSES DATA PACKAGE

Lab Name: ROCKY MOUNTAIN ANALYTICAL Contract: 68-01-7476

Lab Code: ENSECO Case No.: 8781 SAS No.: 3551B SDG No.: MBL583

SOW No.: 7/87

EPA Sample No.	Lab Sample ID.
MBL583	
MBL583D	
MBL583S	

RECEIVED
JAN 26 [illegible]
S & M BRANCH

Were ICP interelement corrections applied? Yes/No YES

Were ICP background corrections applied? Yes/No YES

If yes-were raw data generated before application of background corrections? Yes/No NO

Comments:
ONE LOW WATER FOR TOTAL METALS AND CYANIDE ANALYSIS

RMA QC# 87570

Release of the data contained in this hardcopy data package and in the computer readable data submitted on floppy diskette have been authorized by the Laboratory Manager or the Manager's designee, as verified by the following signature.

Lab Manager: [signature]

Date: 01/22/88

U.S. EPA CLP

1

INORGANIC ANALYSIS DATA SHEET

EPA SAMPLE NO.

MBL583

Lab Name: ROCKY MOUNTAIN ANALYTICAL Contract: 68-01-7476

Lab Code: ENSECO Case No.: 8781 SAS No.: 3551B SDG No.: MBL583

Matrix (soil/water): WATER Lab Sample ID: _____

Level (low/med): LOW Date Recieved: 12/23/87

% Solids: 0.0

Concentration Units (ug/L or mg/kg dry weight): UG/L

CAS No.	Analyte	Concentration	C	Q	M
7429-90-5	Aluminum	43.0	B		P
7440-36-0	Antimony	31.0	U		P
7440-38-2	Arsenic	4.0	U		F
7440-39-3	Barium	3.9	B		P
7440-41-7	Beryllium	1.0	U		P
7440-43-9	Cadmium	5.0	U		P
7440-70-2	Calcium	257	B		P
7440-47-3	Chromium	5.0	U		P
7440-48-4	Cobalt	6.0	U		P
7440-50-8	Copper	10.3	B		P
7439-89-6	Iron	43.7	B		P
7439-92-1	Lead	5.0	U	N	F
7439-95-4	Magnesium	90.0	U		P
7439-96-5	Manganese	11.4	B		P
7439-97-6	Mercury	0.2	U		CV
7440-02-0	Nickel	7.0	U		P
7440-09-7	Potassium	111	U		P
7482-49-2	Selenium	2.0	U		F
7440-22-4	Silver	5.0	U	N	P
7440-23-5	Sodium	1500	U		P
7440-28-0	Thallium	2.0	U		F
7440-62-2	Vanadium	2.0	U		P
7440-66-6	Zinc	13.0	U		P
	Cyanide	10.0	U		AS

Color Before: COLORLESS Clarity Before: CLEAR Texture: _____

Color After: COLORLESS Clarity After: CLEAR Artifacts: _____

Comments:

SAMPLE IS A BLANK

DOCUMENTS ON RESERVE

2.4 EE/CA APPROVAL MEMORANDUM (FOR NON TIME CRITICAL REMOVEALS)

2.5 EE/CA

2.6

ACTION MEMORANDUM

TAT-02-F-03815

International Metallurgical Services
Newark, Essex County, New Jersey
July 6, 1987

Preliminary Site Investigation Report

Prepared by:
Michael Mentzel TAT II
William Kowalski TAT II
Therese Perrette TAT II, QC
Weston/SPER Division
Edison, New Jersey 08837

Prepared for:
John Witkowski
Response and Prevention Branch
Emergency and Remedial Response Division
U.S. EPA, Region II
Edison, New Jersey 08837

TABLE OF CONTENTS

1.0 PURPOSE AND SCOPE

In a letter dated June 1, 1987 from Mr. John Trela, Director, Division of Hazardous Waste Management, New Jersey Department of Environmental Protection (NJDEP), to Mr. Steven Luftig, Acting Director, Emergency and Remedial Response Division, United States Environmental Protection Agency (U.S. EPA), Region II, the New Jersey Department of Environmental Protection, requested the U.S. EPA to assume the lead role on the investigation of possible cleanup action at the International Metallurgical Services building located in Newark, New Jersey.

The U.S. EPA in turn requested the Region 2 Technical Assistances Team (TAT) to perform a prelimary site investigation to gather information on the site and confirm findings reported by the NJDEP.

The following is an account of information gathered by TAT.

2.0 BACKGROUND AND SITE HISTORY

International Metallurgical Services (IMS) is located at 196 Blanchard Street in Newark, New Jersey. IMS operated at this site until November, 1984. Principal operations included the recovery of silver from used photographic film, recovery of gold from used electronic circuit boards, and the upgrading of medium grade gold to buillion grade. The building and surrounding site property are presently abandoned.

The building is an all concrete and brick, four story structure surrounded on three sides by a secured fence, however, access to the property may be gained along the embankment to the Passaic River.

The building was constructed on piles, one to two feet above grade and is approximately 50 by 130 feet. It is approximately 25 feet from the Passaic River. There is currently no utility service.

The abandoned building is vulnerable to periodic vandalism which resulted in a NJDEP repsonse to secure leaking drums.

This is an industrial area with no residential property in the immediate area. The nearest occupied building is a tavern, approximately 40 feet southwest, across Blanchard Street. Several other businesses are also active southwest of the site on Blanchard Street.

IMS filed for Chapter 11 on April 15, 1982. The filing was changed to involuntary Chapter 7 on January 6, 1986. Salable equipment was auctioned off by the Court appointed trustee, Santo J. Lalomia, Esq., 140 Market Street, Paterson, New Jersey. Hazardous wastes remain in containers in the building. The city of Newark has refused to foreclose on some $98,000 in back property taxes and is requesting assistance in removing the hazardous waste.

David Beeman of the New Jersey Department of Environmental Protection (NJDEP) has been active at the site since January 1987. NJDEP has conducted several site investigations in the spring of 1987 and has compiled an inventory and file on the history of the site (see Appendix A).

3.0 TAT SITE INVESTIGATIONS

On June 19, 1987, U.S. EPA and TAT met with David Beeman of NJDEP at the IMS site. Utilizing level "B" protection, a preliminary site investigation was conducted which included air monitoring with HNU, HCN monotox, combustible gas/O_2 meter, radiation detector and drager tubes. All air monitoring inside the building was equivalent to background readings except for the cyanide monotox which read as high as 3 ppm in certain locations.

Windows on the upper floors were opened to better vent the building so the level of protection could be downgraded to "C".

On July 1, 1987 U.S. EPA and TAT again investigated the site. The NJDEP inventory was confirmed to be very accurate. This report is included in Appendix A and the inventory will be used by TAT as the official site inventory. TAT has expanded upon this inventory and created "spread sheets" listing properties of each chemical found (see Appendix B).

Air monitoring was conducted as before with the addition of an OVA and long duration cyanide draeger tubes. All readings were equivalent to backgound except for the OVA which read 8-10 ppm on the 4th floor. Windows were opened on this floor to better vent the atmosphere. One of the long duration cyanide draeger tubes did show a positive (red) result.

A positive conclusion on actual concentrations of HCN could not be made at the time in the field. This prompted the EPA-OSC to request sampling of the air on

each floor for cyanide, NO_x, SO_x, H_2S, HCL, Hydrazine, and ammonia compounds.

TAT investigated the possibility that tanks on the third floor may contain some type of product. Almost all of the tanks were labelled as some type of alcohol and a sign stating " " was located above the entranceway to one room also implying the material may be alcohol. Several tanks were positively identified as being empty. An accurate inventory is included in Appendix A. Access to the sealed tanks may have to be made to confirm they are empty or to sample any contents found.

Other more specific tasks performed by TAT while in the building included checking the PH of liquid in a pail next to a drum labeled HNO_3. The PH paper used gave an indication of OpH. Several electrical outlets on each floor as well as fuse boxes and main junction boxes were checked with a power tester. All power appears to be shut off, however, the possibility that a stray or illegal live wire may be inside the building still exists.

The heating pipes were checked for asbestos. It is believed that asbestos is present on several pipes in the building especially at the elbow joints. This prompted the EPA-OSC to request that two air samples and two solid samples be taken to confirm the existence of asbestos in the air or on the site.

When the investigation of the interior of the building was completed EPA and TAT conducted a survey of the exterior of the building and surrounding property. One bulging drum is located in the southwest corner of the property. No label could be seen from a safe distance. Electrical power in the oil burner room was checked and found to be turned off. This included the main switches to the building. Most of the fuses had been removed. Nothing could be seen under the building as the crawlspace is very low and dark.

Around the north end of the building (facing the Passaic River) several large cardboard boxes were observed containing acetate film spent during silver recovery. One large pile rests against the building. Total volume of acetate film was estimated by TAT to be 60-80 cubic yards. Two box trialers and other debris are also located in this area.

Two wild dogs were observed inside the fenced area of the site during this investigation.

THIRD FLOOR TANK INVENTORY

Tank #	Markings	Observations	Size
1	SDA Alcohol	Hatch	5,500 gal.
2	"	"	"
3	"	"	"
4	"	"	"
5	"	No Hatch/Sight Glass	"
6	"	"	"
7	"	"	"
8	"	"	"
9	"	"	"
10	"	"	"
11	"	"	"
12	"	"	"
13	Anhydrous 2B 200 Proof	Sight Glass	7,800 gal.
14	SDA 40 Anaydrous 200 Proof	"	"
15	Anhydrous 3A 200 Proof	"	"
16	SDA 40 Anhydrous 2B 200 Proof	"	"
17	Imported		"
18	"	Sight Glass Removed(empty)	"
19	200 Proof		"
20	Grain		"
21	Imported		"
22	"		5,300 gal.
23		On Scale (scale=0)	"
24		Empty	7,800 gal.
25		"	"
26		"	"
27		"	"
28		"	"
29		"	2,000 gal.
30		"	"
31		"	"
32		Hole Cut In Top	"
33		Empty	"
34		Sight Glass	"
35		"	"
36		"	"
37		"	"
38	Butylacaetate and Isopropyl 99%	Empty Sight Glass Removed	"
39	SDA Alcohol		"
40	" "		7,800 gal.
41	SDA 40 Alcohol		"
42	SDA Alcohol		"

Sodium Chromate
Magnesium Dioxide
Potassium Ferrocynaide
Sodium Hypophospate
Magnesium Chloride
Pyridine
Phenol 88%
Methyl Ethyl Ketone
Ferric Oxide
Ferrous Sulfate
Mercuric Iodide
Propylene Glycol
Potassium Bromide
Lithium Metaborate
Standard Soap Solution
Potassium Pyrophosphate
Freon 12
Vanadium Pentoxide
Sodium Silico Floride
Barium Carbonate
Ammonium Citrate
Molybdic Acid
Arsenious Acid
Methylene Blue
Ethyl Acetate
Acetic Acid
Lanthanum Nitrate
Pyrogallic Acid
Ammonium Floride
Calcium Carbonate
Magnesium Perchlorate
Boric Acid
Chromic Acid
Lime, Borax, Soda Ash
Cyanide 35 gal, 1 lb
Potassium hydroxide 55 gal
Sulfurous Acid 20 lb, 3 gal, 20 gal
$FECl_2$, 20 gal, 110 gal
Potassium Hydroxide 55 gal
"Fyuvquel"
Acetylene 1 cylinder
Ammonium Hydroxide 3 gal
Nitric Acid 55 gal
Mocroposit Remover 1112A 30 gal
HCL 55 gal
Hydrazine Hydrate 55 gal
Nuodex Naphthenate Cobalt 6% 20 gal
NaOH 55 gal
Formic Acid 55 gal
Ammonium Chloride 10 lbs
Sodium Sulfate 100 lbs
Copper Sulfate 50 lbs
HTH Dry Chlorine 100 lbs
Notrobenzene Sulfonic
Acid, Sodium Salt 120 lbs
Profexmatit 55 gal
Zinc Dust 40 gal
Nickel Powder 600 lb
Tannic acid 50 lbs
Hydrazine Sulfate 250 lbs

Lab Container

Sulfurous Acid
Ammonium Chloride
Sodium Borohydroxide
Oxalic Acid
Tartaric Acid
Cinchonine
Potassium Thiocyanate
Sodium Bicarbonate
Sodium Hydroxide
Ferric Ammonium Sulfate
Sodium Bromate Solution

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: FEB 10 1988

SUBJECT: EXPEDITED ACTION MEMORANDUM for SHOCK SENSITIVE CHEMICALS - Request for CERCLA Removal Action Monies at the International Metallurgical Services Site, Newark, New Jersey

FROM:

TO: John J. Shaw, On-Scene Coordinator
Response and Prevention Branch

Stephen D. Luftig, Director
Emergency and Remedial Response Division

In response to a request from New Jersey, a preliminary assessment of the International Metallurgical Services hazardous waste site has been conducted.

The site meets CERCLA removal action criteria. Four bottles of shock sensitive methyl ethyl ketone peroxide have been identified. Other explosive chemicals such as magnesium perchlorate and lanthanum nitrate have also been identified. Extremely hazardous chemicals have been found in deteriorating containers. Incompatible chemicals are adjacent to each other.

We propose to stabilize the site by: the removal/disposal of the shock sensitive chemicals, explosives; overpacking some of the hazardous chemicals presently in deteriorating containers; separating known incompatible materials; recyling of extremely hazardous substances; and securing of the building, as an expedited removal action to reduce the threat of fire/explosion and the threat from direct contact.

The project budget for this proposed action is $230,000, of which $150,000 is for mitigation contracting; $30,000 is for TAT; $23,000 is for EPA; and $27,000 is for contingency.

An Action Memorandum dealing with the full details regarding this site will follow.

Please indicate your approval and authorization of funding, per current delegation(s) of authority, by signing below.

Approved _____ Date 2/10/88

Stephen D. Luftig, Director
Emergency and Remedial Response Division

cc: (after approval is obtained)
C. Daggett, 2RA
R. Salkie, 2ERR-DD
S. Luftig, 2ERR
G. Zachos, 2ERR-RP
R. Cobiella, 2ERR-RP
B. Sprague, 2ERR-RP
J. Czapor, 2ERR-SC
J. Frisco, 2ERR-NJRA
J. Marshall, 20EP
W. Mugdan, 20RC-DRC
R. Gherardi, 20PM-FIN
T. Sullivan, PM-214F (EXPRESS MAIL)
T. Fields, WH-548B
J. Gaston, NJDEP
P. McKechnie, 21G
V. Pitruzello, ERRD-PS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: SEP 12 1989

SUBJECT: Preliminary Assessment; Request for Increase in CERCLA Removal Action Monies and Exemption from the Twelve Month Statutory Limit for the International Metallurgical Services Site, Newark, Essex County, New Jersey - ACTION MEMORANDUM

FROM: John J. Shaw, On-Scene Coordinator
Response and Prevention Branch

TO: William J. Muszynski, P.E.
Acting Regional Administrator

THRU: Stephen D. Luftig, Director
Emergency and Remedial Response Division

I. EXECUTIVE SUMMARY

On June 3, 1987, the New Jersey Department of Environmental Protection (NJDEP) requested that the United States Environmental Protection Agency (EPA) take the lead role in removing the hazardous waste from a bankrupt precious metals refining facility, International Metallurgical Services, Inc. (IMS), located at 196 Blanchard Street, Newark, New Jersey. This project was delayed for several months as a result of a request by the NJDEP to the EPA to follow up on a lead for a buyer of the property who would then become a potential responsible party (PRP). Subsequent sampling and analyses by EPA have indicated the need to move forward with this removal action. Therefore, EPA has assumed the lead on the potential enforcement action and with NJDEP's knowledge issued notice letters to PRPs and a letter to the potential buyer for the property. Subsequently, on February 22, 1988, after negative response from the PRPs, EPA initiated an expedited Limited Scope Removal Action.

IMS is an abandoned four story facility. Abandoned at the site were approximately 180 drums, pails and bags, 1100 laboratory reagent containers, 50 storage tanks, several vats and 100 cubic yards of combustible spent acetate photographic film. Many of the containers have deteriorated and have released their contents into the environment. Eighteen CERCLA designated hazardous substances, twelve of which are designated as extremely hazardous, have been identified inside and outside the building. Asbestos and hazardous gases in the air have been detected. The building is grossly contaminated, and the facility has often been a target for break-ins and vandalism. Since releases have occurred at the site, it poses a threat to human health and the environment through fire, explosion and direct contact with extremely toxic substances.

EPA has performed a preliminary site assessment for removal action. This 27 page memorandum summarizes the results of that assessment and details the proposed removal action. If the

property is purchased, then the new owner may perform the cleanup. In that event, project funding would be terminated. At this time, however, no PRP is taking any removal actions at the site.

Due to the budgetary constraints, a limited action was authorized and the February 2, 1988 removal action was undertaken to mitigate the most serious threats presented by the site until additional funding became available or until such time that a PRP assumed the project. The action taken was funded at $230,000 of which $150,000 was for mitigation contracting. Out of these amounts, $98,000 was expended for mitigation contracting and $129,000 was expended for TAT and EPA, which establishes a project cost of $227,000 for the limited action. The limited action has partially stabilized the site by removing shock sensitive and some other hazardous materials, overpacking of laboratory reagents, recycling some of the hazardous substances, separating known incompatibles and securing the building.

Based on materials discovered during the limited action taken, new monies are now being requested. There are materials remaining which require further immediate attention to minimize the threat of fire, explosion and direct contact.

The requested new project ceiling for removal action at this site is $1,031,000 of which $573,000 is for mitigation contracting. This is an increase of $801,000 of which $423,000 is for mitigation contracting. This request also adjusts TAT and EPA costs for the actual expenditures incurred under the limited action.

The contaminated walls, floors, ceilings and the contamination contained in the sub-surface will not be removed under this action. At this time, this contamination does not present an immediate threat to human health, welfare and the environment. This decision is in accordance with J.W. Porter's March 1988 memorandum (copy attached). The sub-surface contamination will be referred to NJDEP for possible remedial action. If, at any future time, the current guidance is amended, or the site is NPL listed, then the site could be handled by the remedial program or revert to the removal program for mitigation of the sub-surface contamination.

II. BACKGROUND

A. Site Setting/Description

IMS occupies about 45,000 square feet in a very old and declining industrial area at 196 Blanchard Street, Newark, New Jersey. The area is bounded on the north by the Passaic River and on the east by the New Jersey Turnpike, (see Figure 1, page 21), which is located within 500 yards of the site. The densely populated residential

area of the Ironbound Section of Newark is located less than 1.5 miles to the southwest. More than 35,000 people live and work within one mile of the site. Approximately 40 feet southwest of the site is a busy tavern.

There is one building on the site which, except for a roof leak, appears structurally sound. The building, situated 10 feet from the curb line, is an all concrete and brick, four story structure. The building, constructed on piles one to two feet above grade, is approximately 50 by 130 feet. Figure 2 (page 22) provides a plan view of the building and property. An elevator shaft providing access to all floors is located near the center of the building. On the NE and SW corners of the building are the stairwells providing access to each floor. Attached to the building is a one-story addition, accessible only from the outside. Part of this addition was used for the boiler and electrical panel. The remainder of this addition, open to the outside, contained two crucibles. There are two garage doors on the southside, one on the northside and a loading bay door on the eastside. A hoist on the eastside has been repaired and used for removing drums, etc., from the upper floors and also for bringing in empty drums and other materials.

The building is surrounded on three sides by fencing and on the fourth side by the embankment to the Passaic River from which unauthorized access to the site may be gained. On the street side a very strong, secure, corrugated steel fence, including two sliding vehicle gates, runs from the northwest corner of the building to the river embankment and from the southwest corner of the building to the adjacent property line. A similar fence and gate runs along the southern property line. On the eastern side, a chain link fence with a small gate (welded shut) runs from the corrugated fence to the river embankment. The south side of the property is bordered by an abandoned site which is now being rehabilitated. Directly on the eastern side, inside the fence, are two unused railroad sidings. Behind this fence is the Norpack Corp., which is an active paper manufacturer. The river is about 25 feet from the building and the railroad siding is located approximately 25 feet east of the building.

The neighborhood is very old, industrialized, run down, and at night, very dangerous. Break-ins and vandalism at the site are a problem. Break-ins have been documented and before EPA was requested to assume the lead role, a story appeared in the newspapers, stating that there had been several break-ins. Subsequent to EPA's involvement, a

building door was forced open, another door was forced open (some bags containing contaminated wastes were opened) and nickel powder (an extremely hazardous substance) was moved to the outside of the building.

B. Brief History

IMS operated a precious metals refining facility at this site until November 1984. Principal operations included the recovery of silver from used photographic film, recovery of gold from used electronic circuit boards, and the up-grading of medium grade gold to bullion grade.

For some period of time to 1976, Commercial Solvents Corporation, a subsidiary of International Minerals and Chemical Corporation, occupied the site. Based on the labels on the tank wagon loading/unloading piping manifold, products or raw materials handled were methanol, isopropanol, cellosolve, butyl acetate, ethyl acetate, methyl isobutyl ketone (MIBK) and nitropropane. From the Directory of Chemical Producers-USA, Commercial Solvents Corporation was known to produce methanol and nitropropane at other sites and to produce ethyl alcohol at Newark.

IMS filed for Chapter 11 on April 15, 1982. The filing was changed to involuntary Chapter 7 on January 6, 1986. Salable equipment was auctioned off by the Court appointed trustee, Santo J. Lalomia, Esq., from Paterson, New Jersey. After payment to creditors, the reported assets remaining are approximately $1,700 in cash and the building and surrounding grounds. Hazardous wastes remain in containers in the building. The City of Newark has refused to foreclose on some $98,000 in back property taxes and is requesting assistance in removing the hazardous waste.

C. Quantities and Types of Substances Present

An inventory of the hazardous materials on-site was made during the limited removal action. The following remain inside the building: 180 drums, pails and bags, 950 laboratory reagent containers and 50 storage tanks. Contents of the storage tanks vary, with many considered to be unknowns. Approximately one hundred cubic yards of combustible spent acetate film and two 20 cubic yard shipping containers (one empty, the other filled with scrap circuit boards) are found outside the building near the Passaic River. There were eighteen CERCLA designated hazardous substances inside and outside the building. Twelve of these are designated as extremely

hazardous substances under Title III (SARA).

Labels from containers and air sampling indicate the chemicals listed in Table 1 (page 6) were present on-site. The toxicological effects of some of the compounds at IMS are listed in Table 2 (page 7).

Air monitoring has been conducted monthly since July, 1987 utilizing: an explosimeter, organic vapor meters (HNU and OVA), personal exposure meters for hydrogen cyanide and hydrogen sulfide (Monitox), particulates in air meter (mini RAM), and various chemical indicators (Draeger tubes). The OVA exhibited readings of up to 8-10 units on the fourth floor of the building. The hydrogen cyanide Monitox exhibited readings up to 3 ppm on the third floor of the building. Sulfur dioxide, up to 4.9 ppm, was found during air sampling conducted July 17, 1987. Asbestos was found at 0.0008 fibers/cc NIOSH method 7400, in one area on the first floor of the building. (This finding occurred at a time of minimal activity). These levels of air contamination indicated the necessity of continued air monitoring and the need for the use of level C protection as a minimum.

The offices and laboratory are located on the first floor, occupying approximately 20% of the floor. The laboratory itself measures approximately 12 ft. by 20 ft. The remainder of the floor is an open area. Approximately 50 containers of chemical reagents were present in the laboratory. These containers range in volume from several ounces to a gallon. One contains a CERCLA designated extremely hazardous substance - sodium hydroxide; a second contains sulfurous acid which releases sulfur dioxide - a CERCLA designated extremely hazardous substance; a third contains ammonium chloride - a CERCLA designated hazardous substance; a fourth contains oxalic acid which has a STEL* of 2 mg/m^3. There were also several unknown solutions. In the open area of the first floor there are three empty 400 gallon mixing vessels, a possible heat treatment vessel, a 35 gallon drum containing

*STEL is short term exposure limit (up to 15 minutes) per American Conference of Industrial Hygienists.
PEL is permissible exposure limit per National Institute for Ocupational Safety and Health, and the Occupational Safety and Health Administration.
Low numerical values indicate that a high health threat to humans is posed by the chemicals.

TABLE 1

Air

* Hydrogen sulfide
* Hydrogen cyanide
* Sulfur dioxide
Asbestos

Acids

Hydrochloric acid
* Sulfurous acid (Note 1)
* Sulfuric acid
* Nitric acid
Chromic acid
Pyrogallic acid
Acetic acid
Molybdic acid
Oxalic acid
Tartaric acid
Tannic acid
** Formic acid
Arsenious acid

Bases

* Sodium hydroxide
Potassium hydroxide
Ammonium hydroxide
Sodium hypochlorite
Sodium hypophosphate
Potassium pyrophosphate

Solvents

** Pyridine
* Phenol
Methyl ethyl ketone (MEK)
* Hydrazine hydrate (Note 1)
Methyl isobutyl ketone (MIBK)

Other

Hydrazine sulfate
Sodium chromate
Magnesium dioxide
Magnesium chloride
Lithium metaborate
Freon 12
* Vanadium pentoxide
Barium carbonate
Ammonium citrate
** Ethyl acetate
Magnesium perchlorate
Lanthium nitrate
Lime, borax, soda ash
Acetylene (cylinder)
Nuodex naphthenate cobalt 6%
Fuel oil
Sodium sulfate
Copper sulfate
Nitrobenzene sulfonic acid, sodium salt
Zinc dust
* Nickel powder
Ferric ammonium sulfate
** Ammonium chloride
Cinchonine
** Mercuric iodide
Potassium ferrocyanide
* Sodium cyanide
Sodium silico fluoride
** Beryllium
Potassium bromide

Note 1 - Releases CERCLA designated extremely hazardous substance
* CERCLA designated extremely hazardous substances (SARA, Title III)
** CERCLA designated EPA hazardous substances/hazardous waste

TABLE 2

SUMMARY OF POTENTIAL TOXICOLOGICAL EFFECTS OF SOME OF THE IDENTIFIED COMPOUNDS

Compounds Found	1. Carcinogenicity	2. Teratogenicity	3. Liver Damage	4. Kidney Damage	5. Lung Damage	6. CNS Affects	7. Mutagenic	8. Irritant	9. Toxic by Inhalation Ingestion or Dermal Contact
Phenol			X	X		X		X	X
Cyanide			X	X		X			X
Hydrogen sulfide					X			X	X
Hydrazine hydrate	X	X			X	X	X		X
Pyridine			X	X		X			X
Chromic acid	X				X			X	X
Arsenious acid	X		X	X					X
Sulfur dioxide				X				X	X
Nitric acid				X				X	X
Asbestos	X			X	X				X
Beryllium	X					X			X

a solid, labelled sodium cyanide brick, a 20 gallon keg labelled ferric chloride, a 55 gallon drum of unknown debris, a 55 gallon drum labelled "corrosive", a 55 gallon drum of Fyrquel hydraulic fluid (possible flammable), a 55 gallon drum labelled Kodak Developer Replenisher (potassium hydroxide) which has a PEL of 2 mg/m^3, four 5 pound bottles of sulfurous acid, two 55 gallon drums of hydrochloric acid (a corrosive), three 1 gallon bottles of sulfuric acid (a CERCLA designated extremely hazardous substance), an acetylene cylinder, a lump of unknown solid, and a puddle of liquid (pH 10) from the floor above. All laboratory reagents have been moved to the second floor.

The second floor is divided into 4 walled off areas. Approximately 40 containers, and several bags of solids are on the second floor. The containers range in volume from one gallon to 55 gallons. Five of the containers contain CERCLA designated extremely hazardous substances: nitric acid, hydrazine hydrate, sulfuric acid, sodium hydroxide and cyanide salt. Other containers, which were present, contain the following dangerous chemicals: a partially full 55 gallon drum of formic acid (an EPA hazardous substance/hazardous waste) and five partially full bottles of MEK peroxide, a shock sensitive substance (PEL 1.5 mg/m^3). There are 19 containers of unknown liquids and solids, and uncounted quantities of paints and various paint thinners. Laboratory reagents from the other floors have been relocated on this floor and placed on tables and shelves, keeping known non-compatibles separated. Some of these reagents have been lab packed and disposed of.

The third floor is divided into two walled off areas and one partially walled off area. There are approximately fifty 5500 gallon and 7800 gallon tanks, some of which have not been checked for contents and volumes. There are 26 containers ranging in size from 5 gallons to 55 gallons. There were two 300 lb. pails, containing a CERCLA designated extremely hazardous substance (nickel powder). There were four 5 gallon pails of zinc dust - on another EPA removal action, wet zinc dust caused considerable problems due to the evolution of hydrogen and heat. There are 14 containers of unknown liquids and solids. The nickel powder has been recycled and the zinc dust has been moved to the first floor.

The fourth floor is divided into two walled off areas,

one partially walled off area and a vault section. There are many bags of chemicals and approximately 1000 containers of chemical reagents. The containers which range in volume from one ounce to one gallon were dispersed haphazardly in boxes, on shelves and on the floor. Containers with CERCLA designated extremely hazardous substances are - phenol and vanadium pentoxide, sulfurous acid which releases sulfur dioxide - others contain EPA hazardous substances, mercuric iodide, ethyl acetate and pyridine, some others contain potentially explosive chemicals - MEK, magnesium perchlorate and lanthanum nitrate while yet others contain acetic acid STEL is 37 mg/m^3, molybdic acid STEL is 20 mg/m^3, chromic acid STEL is 30 mg/m^3 and bags of lime - PEL is 2 mg/m^3, which indicate the extreme hazard of these materials. All the laboratory reagents were moved to the second floor.

Outside of the building, on the northside, are several large piles of combustible spent acetate photographic film scrap (approximately 100 cubic yards) which burned easily in a field test. There are a 20 cubic yard shipping containers on the northside which contains scrap circuit boards and two drums of unknown material. A drum of unknown material rotted and spilled its contents onto the ground next to the container. This material is now solid. On the eastside loading platform, were two green steel drums labelled nickel powder, one containing 300 lbs. and the other possibly more, both of which have been recycled. In addition, there were four 5 gallon pails of zinc powder. Nickel is a CERCLA designated extremely hazardous substance and is explosive in the powdered form. The nickel and zinc were formerly on the third floor (see above) but vandals hoisted them down to the platform. The zinc is now stored on the first floor.

There is a 1,000 gallon above ground tank on the southside of the building which may have contained fuel oil. The inside of the tank has not been tested for PCB contamination.

There is a tank wagon loading/unloading piping manifold on the southside of the building. A sign indicates products which may have been used in this manifold, including methanol, isopropanol, cellosolve, butyl acetate (an EPA hazardous substance), ethyl acetate, MIBK, and nitropropane (an explosive substance when shocked or heated). These same substances may be or may have been in some of the tanks located inside the building, all of which have yet to be inspected.

Soil samples taken outside the building contain as much as 67 ppm of beryllium, which compares to 0.6 ppm background. Beryllium is a known carcinogen and a poison.

Actions taken under the Expedited Action Memorandum have resulted in the moving of all the laboratory reagent containers to the second floor. In addition, about 150 of the more hazardous chemicals have been lab packed and sent for incineration. Nickel, aluminum and hydrazine sulfate have been recycled.

D. National Priorities List Designation

This site is not on the National Priorities List.

III. THREAT

A. Threat to Public Exposure

Fire and Explosion -

A serious threat of fire and explosion exists at this site.

It is easy for people to gain access to the site from the unfenced river side and then force open one of the building doors. The very isolation of the site makes unobserved entry possible. In fact, the discovery of this hazardous waste site was brought about by an investigation of a shooting. It has been speculated that the use of the site to recover precious metals has drawn fortune hunters to the site. Indeed, armed guards patrolled the premises in its heyday. Since EPA became involved, there have been several forced entries.

In addition to arson, other potential sources of fire and explosion include:

(1) Lightning -- Thunderstorms are commonplace in the summer months, and this building is one of the highest structures in the immediate area.

(2) A violent reaction of incompatible or unstable chemicals - a wide array of incompatible and possibly unstable hazardous substances have been identified (i.e. acids, bases, corrosives, volatile/flammable solvents, zinc dust, acetylene, perchlorate, and nitroparaffins). Chemical changes may have occurred. Chemicals may have become unstable with age. Also, unknown containers with possibly incompatible materials are stored side by side.

At least one bottle has been shattered by instability. The potential exists for a violent reaction of incompatible or unstable chemicals. In the event of fire and/or explosion, toxic fumes could present a significant threat to the surrounding worker and commuter population. During daytime working hours, it is estimated several hundred workers are present in the immediate vicinity. Wind conditions could exist which might threaten travelers on the NJ Turnpike, Routes 1 and 9 and the PATH trains. No fire extinguishing system is active in the building.

Direct Contact -

In addition to the threat of fire and explosion, this site poses a serious direct contact threat to people. It has already been mentioned that people have invaded the site. There have been leaking drums, overturned drums and broken bottles. In addition, EPA air analyses have documented the presence of asbestos fibers, hydrogen cyanide, sulfur dioxide and hydrogen sulfide. Direct exposure of a vandal or trespasser through inhalation of toxic chemicals or contact with strong acids, bases and metals such as beryllium is a possibility. Skeletons of dead animals have been observed on-site.

B. Evidence of Extent of Release

Samples have been taken of the air, soil, leaking containers and of material found on the floor. These have been analyzed and found to contain: asbestos, cyanide, sulfur dioxide, beryllium, zinc powder and nickel powder; all of which are hazardous substances. Aluminum, nickel and zinc powders found are also explosive and reactive. A container of strong acid had been spilled.

C. Previous Actions to Abate Threat

On August 19, 1986, the building entrances were secured and locked by the Fire Department.

On August 27, 1986, Mr. Dave Beeman of the NJDEP contacted the bankruptcy trustee, Mr. Lalomia, to make him aware of "-- a potentially hazardous condition" at 196 Blanchard Street. Mr. Lalomia advised that there was not enough money left for disposal of the hazardous wastes.

On May 8, 1987, Mr. Dave Beeman, of the NJDEP uprighted a leaking 55 gallon drum of hydrochloric acid and a leaking 55 gallon drum of hydrazine hydrate and then separated

them from each other and other material.

On June 1, 1987, after periodic acts of vandalism, resulting in NJDEP responses to secure leaking drums, the NJDEP requested that EPA assume the lead role.

NJDEP and the EPA have installed locks on gates and doors. In addition, warning signs were installed on the fences and the building. The EPA has continued to monitor the site by making periodic visits. The EPA discovered a break-in on October 16, 1987.

D. Current Actions to Abate Threat

The NJDEP has been in contact with several potential buyers of the property. These parties have conducted some limited investigatory actions pertaining to clean-up and removal. NJDEP, however, does not place much credence on the independent analytical results obtained.

With the exception of the action documented herein, no current mitigative effort is known to be under way or planned.

IV. ENFORCEMENT

Region II's Site Compliance Branch and Office of Regional Counsel are attempting to identify the existence and financial capabilities of any potentially responsible parties (PRPs). To date, the only identified PRPs are the incorporators of International Metallurgical Services Inc., Victor and Barbara Pannone. EPA issued a Notice Letter to the Pannones on November 10, 1987 and to the International Minerals and Chemicals on February 23, 1988, with no positive reply to date.

EPA does not anticipate that the aforementioned PRPs will volunteer to perform the work. There is a possibility that the property may be purchased and the purchaser will therefore have to agree to clean up the property either under an EPA order or under New Jersey's Environmental Cleanup Responsibility Act (ECRA).

V. LIMITED SCOPE REMOVAL ACTION PROJECT AND COSTS

A. Objective of the Limited Scope Removal Action Project

The objective of the limited scope removal action project was to reduce the threat of fire and explosion and the risk of direct contact with hazardous substances abandoned and released at this site. This objective has been accomplished by site stabilization actions.

B. Limited Scope Removal Action Project Tasks

The tasks undertaken were site stabilization actions. Included were the removal/disposal of already identified explosives, overpacking some of the hazardous chemicals presently in deteriorating containers, staging of laboratory chemicals, separating known incompatible materials, recycling of extremely hazardous substances and securing of the building.

C. Estimated Cost of Limited Action

Mitigation Contracting Cost (Expended)	$ 98,000
Extra Mural Cost (TAT)	$ 49,000
Intramural Cost (EPA)	$ 80,000
Total, Limited Action Cost to Date	$227,000

VI. PROPOSED PROJECT AND COSTS

A. Objective of the Project

The objective of the proposed project is to remove the chemical threat associated with fire and explosion and the risk of direct contact with above ground hazardous substances abandoned and released at this site. This objective is best accomplished by sorting, segregating and disposing of these abandoned chemicals. Sampling and analysis for compatibility and disposal will be performed as required. Site security will be maintained throughout the cleanup. This action will contribute to the efficient performance of any long term remedial action in accordance with 104(a)(2) of CERCLA. The data which will be obtained from this removal action will provide valuable information for any future remedial action.

Decontamination of the building surfaces will not be done. It is not the objective of this project to entirely decontaminate and decommission (D&D) this facility. Chemical and physical hazards will be removed to the extent practical to effect a safe and efficient removal action. This facility is zoned for industrial use, specifically chemical manufacturing. Future buyers and sellers should be required to determine if the building, equipment, storage tanks, etc. are salvageable. Future sale of the facility is subject to the New Jersey ECRA law and regulations, which further justifies this approach toward D & D of the IMS facility.

Sub-surface contamination will not be addressed at this time and therefore this project does not address subsequent mitigative actions and associated costs thereof for the contaminated surface soil, sub-surface soil and the groundwater.

B. Complete Project Tasks

This section lists the major tasks required to achieve the objective of this project. The tasks are divided into two major categories: 1) site preparation for removal operations and 2) waste handling and disposal.

The proposed work tasks for this project are itemized below:

(1) Site Preparation for Removal Operations

a. Mobilize Mitigation Contractor

Including office trailer, decontamination trailer, Porta John and other specific equipment needed.

b. Security

Provide site security when ERCS contractor equipment is at the site.

c. Restore Electric Power

(2) Waste Handling and Disposal (for portion not completed under Limited Action).

All the material in the building will be inventoried, tested for compatibility and restaged inside the building. Several waste streams will be identified. The material in each waste stream will be bulked and sent out as one shipment. See Table 1 (Page 6) for a list of chemicals potentially identified in each waste stream.

a. Cyanides

All material will be treated at an off-site approved cyanide disposal facility. Material will be shipped in original packaging or overpacked for safe transport.

b. Solvents

Material will be bulked on-site, tested for burn characteristics and disposed of at a proper incineration facility.

will not be pursued.

c. Acids/Bases

Acids and bases will be treated appropriately.

d. Arsenic Compounds

All arsenic compounds will be treated at an approved off-site treatment facility.

e. Mercury Compounds

All mercuric compounds will be treated at an approved off-site treatment facility.

f. Fluoride Compounds

All fluoride compounds will be treated at an approved off-site treatment facility.

g. Reclamation/Recycling

Any material found in good condition in original packaging will be offered free of charge to the original manufacturer or a recycling facility.

h. Laboratory Reagents

Laboratory chemicals will be identified and packed in drums with alternating layers of sorbent material. The lab packs will be disposed of at an incinerator or landfill facility.

i. Bulk Liquids

The contents of several large storage vessels may contain alcohol or other unidentified liquids. These wastes will be disposed of by incineration, if possible.

j. Solid Hazardous Waste

Solid hazardous waste will be disposed of in a RCRA approved landfill.

k. Explosive Chemicals (for portion not completed under Limited Action)

Any chemicals found to be potentially shock sensitive or explosive will be disposed of by trained professionals through detonation at an approved off-site location.

1. Radioactive Chemicals will be disposed of appropriately.

C. Estimated Total Cost for Completing the Project

The estimates are based on previous field experience and the 1987 ERCS contract rates. Costs are rounded to the nearest $100 in this section.

Mitigation Costs for Completing the Project

Operational Costs	$ 270,500
Disposal (Includes Transportation)	$ 125,500
Subtotal, Mitigation Costs	$ 396,000
Contingency Factor, 20%	$ 79,200
Total Mitigation Costs (rounded)	$ 475,000

Extramural Costs (TAT)

Field Support (2)	$ 96,500
Office Support	$ 9,400
Total TAT Costs (rounded)	$ 106,000

Intramural Costs (EPA)

Direct Regional Costs	$ 35,100
Indirect Costs,	$ 79,600
Headquarters Costs, 10% of Direct Costs	$ 3,500
Total EPA Costs (rounded)	$ 118,000
Subtotal Estimated Cost for Completing the Project	$ 699,000
Contingency Factor, 15%	$ 104,900
Total Estimated Cost for Completing the Project (rounded)	$ 804,000

A detailed cost estimate Figure 3, starts on page 23.

Combined Estimated Total Project Cost

1. Monies Spent on Limited Scope Removal Action-Ref. pg. 13

Mitigation Contracting	$ 98,000
Extramural Costs (TAT)	$ 49,000
Intramural Costs (EPA)	$ 80,000
Total (Out of an approved project ceiling of $230,000)	$ 227,000

2. Estimated Cost to Complete Project-Ref. pg. 16

Mitigation Contracting	$ 475,000
Extramural Costs (TAT)	$ 106,000
Intramural Costs (EPA)	$ 118,000
Subtotal	$ 699,000
Contingency Factor, 15%	$ 105,000
Total	$ 804,000

3. Combined New Project Ceiling

Mitigation Contracting	$ 573,000
Extramural Costs (TAT)	$ 155,000
Intramural Costs (EPA)	$ 198,000
Contingency Factor	$ 105,000
Total Combined Project Ceiling	$1,031,000
(Less previous approved $230,000 for an increase in funding of	$ 801,000)

Mitigation Contracting Cost Summary

Combined Project Cost	$573,000
Less Approved Limited Scope Removal Action Funds	$150,000
Increase in Funding Requested	$423,000

VII. Projects Schedule

The proposed removal action will be performed in several phases. The time to complete the proposed project is expected to exceed 12-month statutory limit for removal actions. (See Proposed Work Schedule, Figure 4, page 27). For this reason, this action memorandum requests your authorization of an exemption to the 12-month limit to complete the proposed removal action. Site conditions meet the criteria for exceeding the time limit as prescribed by Section 104(c)(1) of CERCLA/SARA as follows:

(1) Continued response actions are immediately required to prevent, limit or mitigate an emergency. A serious threat of fire or explosion exists at the site. Large quantities of hazardous substances, many of which are flammable and potentially explosive, are abandoned at this facility. Potential source of fire or explosion include arson, lightning, spread of fire from a nearby facility, and a violent reaction of incompatible or unstable chemicals.

chemicals.

(2) There is an immediate risk to public health or welfare or the environment. A toxic plume resulting from a fire or explosion at the IMS facility could seriously threaten workers at nearby facilities, the tavern across the street, nearby commuters on the heavily travelled New Jersey Turnpike and more than 35,000 residents who live within one mile of the site. Conditions on site pose a direct contact threat. Air analyses also indicate an inhalation threat.

(3) Such assistance will not otherwise be provided on a timely basis. The New Jersey Department of Environmental Protection has referred this cleanup project to EPA. Potentially responsible parties notified by EPA to date have not indicated a willingness to assist in the cleanup. No mitigative effort other than the proposed removal action in this action memorandum is known to be planned or underway.

VIII. RECOMMENDATION

I recommend your approval of the proposed removal action and an exemption to the 12-month statutory limit on removal actions as detailed and justified above. In accordance with Section 104(a)(2) of CERCLA, the proposed removal action contributes to the efficient performance of any long term remedial action at this site. Under 40 CFR 300.65 of the National Oil and Hazardous Substances Pollution Contingency Plan, a removal action is appropriate at this site due to the existence of:

(1) Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chain [300.65(b)(2)(i)];

(2) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release [300.65(b)(2)(iii)]; and

(3) Threat of fire or explosion [300.65(b)(2)(vi)].

The combined project ceiling requested for completing the full IMS project is $1,031,000 of which $573,000 is for mitigation contracting. These figures include a $230,000 ceiling and $150,000 for contracting covered under the "Expedited Action Memorandum" signed on February 10, 1988. Therefore, this request is for an increase of $801,000 of which $423,000 is for additional mitigation contracting.

There are sufficient monies in our current Advice of Allowance to fund this project. Priority for funding was assigned in accordance with our recent discussions (at the Edison office) regarding the use of the remaining FY 88 removal monies.

Your authority to approve this request is established by Administrator Lee Thomas's Interim Delegation 14-1-A of September 26, 1987.

Approved: JPRandall for WJM Date: 9/14/88

Disapproved:_____ Date:_____

cc: (after approval is obtained)
S. Luftig, 2ERR
K. Callahan, 2ERR-DD
R. Salkie, 2ERR-RPO
G. Zachos, 2ERR-RP
J. Witkowski, 2ERR-RP
B. Sprague, 2ERR-RP
J. Czapor, 2ERR-SC
J. Frisco, 2ERR-NJRA
D. Karlen, ORC-SUP
M. Randol, 2OEP
R. Gherardi, 2OPM-FIN
S. Anderson, PM-214F (EXPRESS MAIL)
T. Fields, WH-548B
J. Gaston, NJDEP
P. McKechnie, 2IG

bcc: C. Moyik, ERRD-PS
L. Guarneiri (WH-548B)
J. Rosianski, OEP

There are sufficient monies in our current Advice of Allowance to fund this project. Priority for funding was assigned in accordance with our recent discussions (at the Edison office) regarding the use of the remaining FY 88 removal monies.

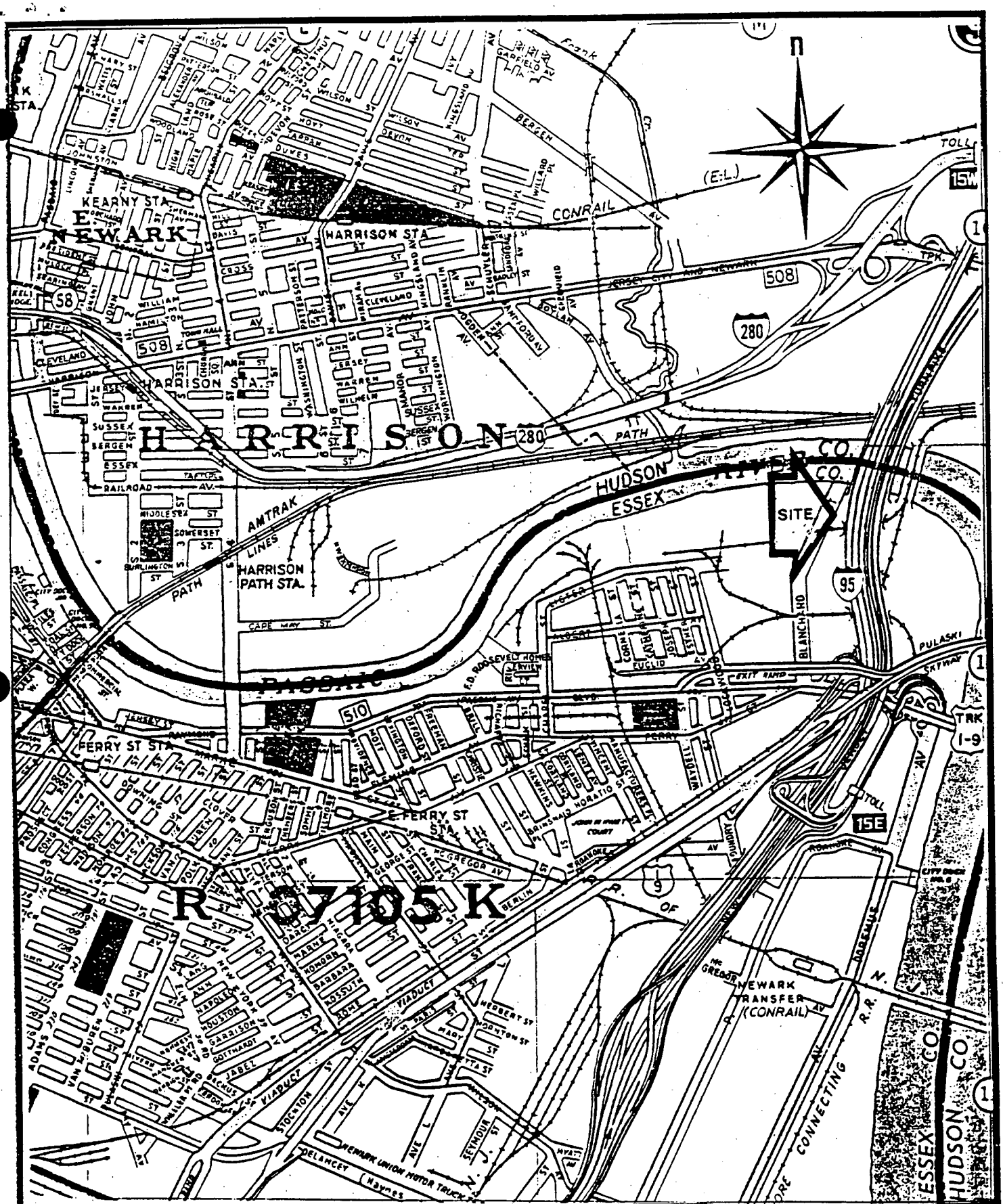
Your authority to approve this request is established by Administrator Lee Thomas's Interim Delegation 14-1-A of September 26, 1987.

Approved: James R. Randall for WJM Date: 9/14/88

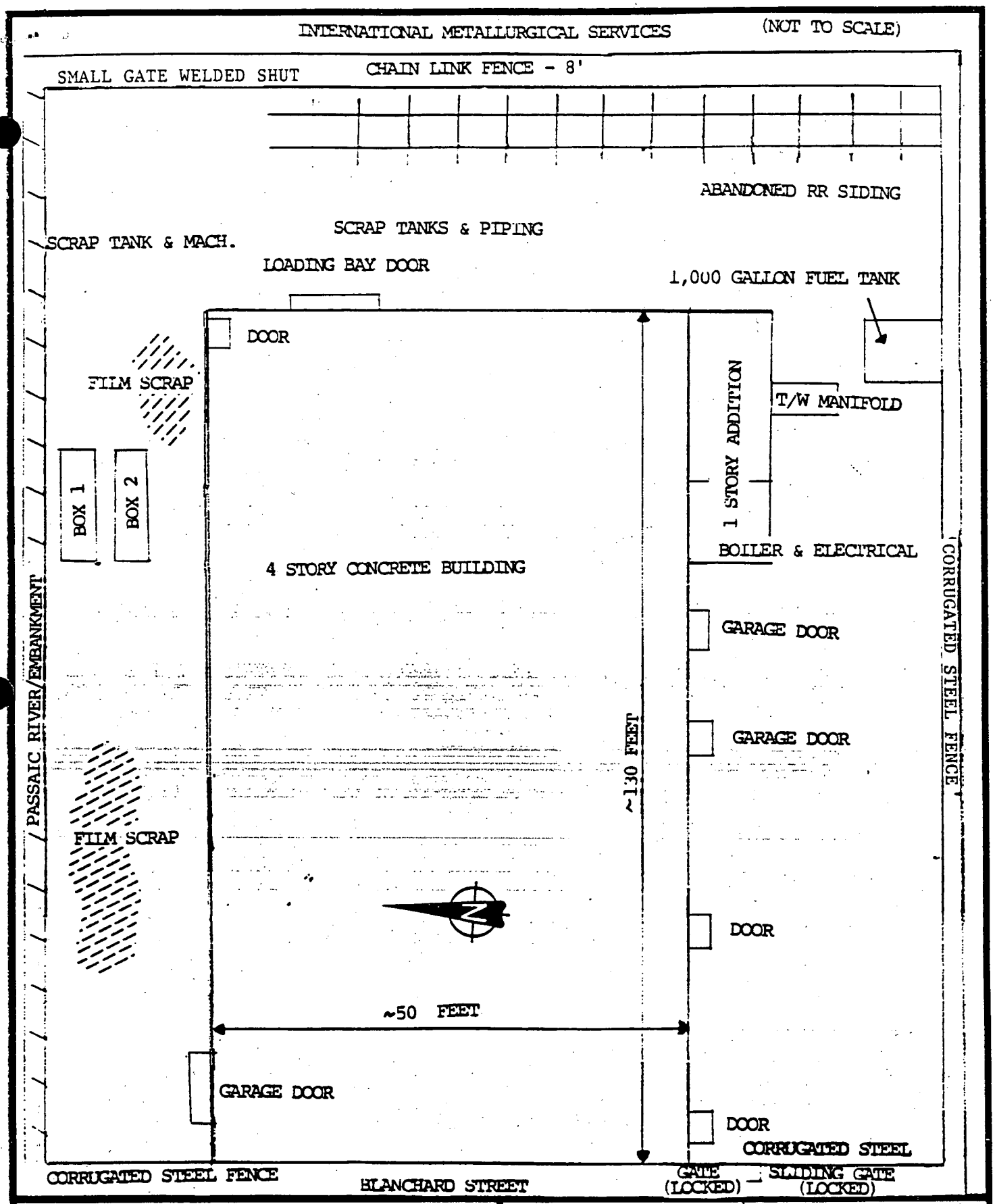
Disapproved:_____ Date:_____

cc: (after approval is obtained)
S. Luftig, 2ERR
K. Callahan, 2ERR-DD
R. Salkie, 2ERR-RPO
G. Zachos, 2ERR-RP
J. Witkowski, 2ERR-RP
B. Sprague, 2ERR-RP
J. Czapor, 2ERR-SC
J. Frisco, 2ERR-NJRA
D. Karlen, ORC-SUP
M. Randol, 2OEP
R. Gherardi, 2OPM-FIN
S. Anderson, PM-214F (EXPRESS MAIL)
T. Fields, WH-548B
J. Gaston, NJDEP
P. McKechnie, 2IG

APPENDIX



WESTON DESIGNERS/CONSULTANTS SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM JOHN SHAW	FIGURE 1
In Association with ICF Technology Inc., C.C. Johnson & Associates, Inc., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.	TAT PM DAVID TRIGGS	SITE LOCATION IMS NEWARK, NJ

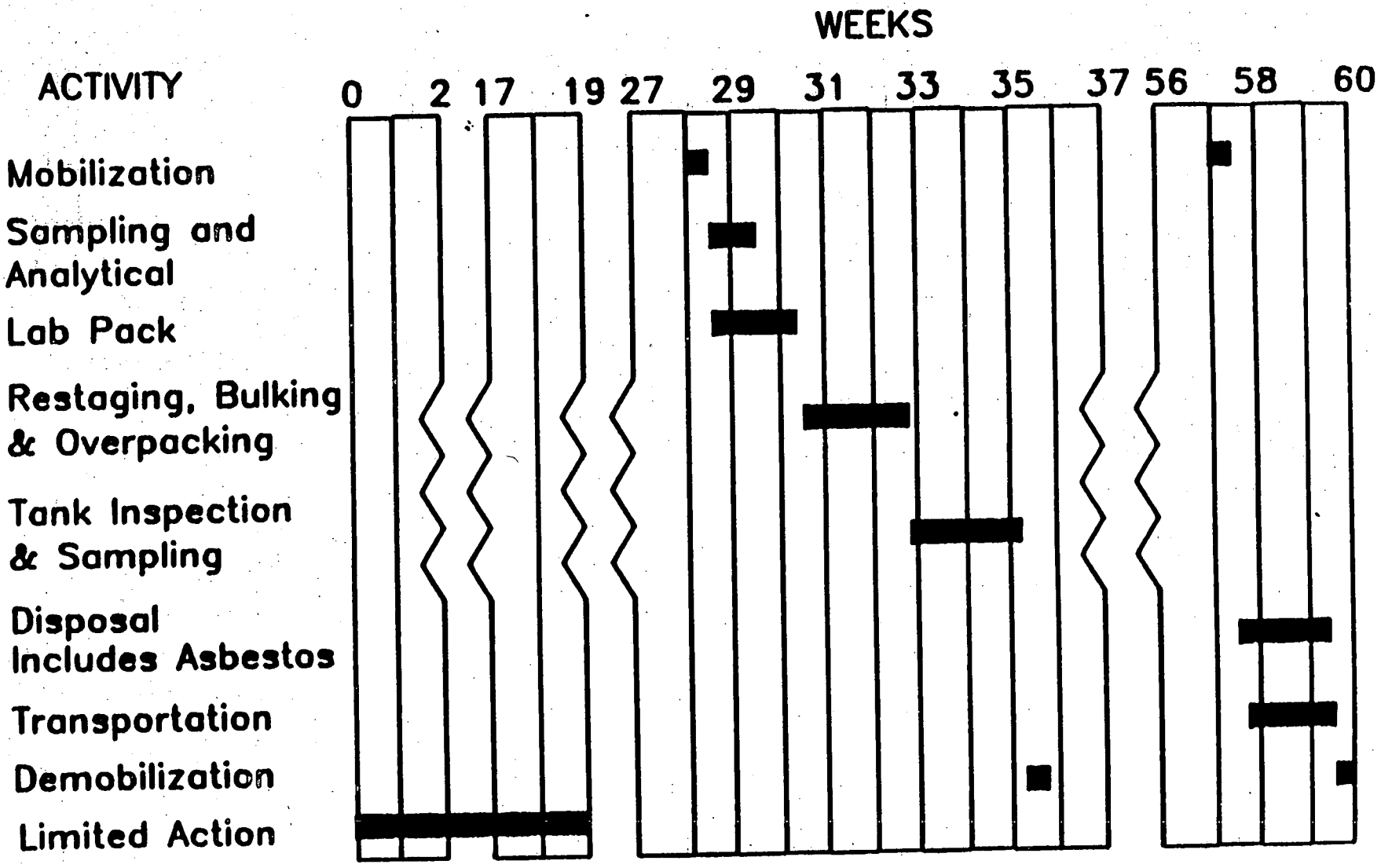


WESTON — SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM JOHN SHAW	FIGURE 2
In Association with ICF Technology Inc., C.C. Johnson & Associates, Inc., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.	TAT PM DAVID TRIGGS	SITE LAYOUT IMS NEWARK, NJ

COST SUMMARY

Subtotal, Mitigation Contracting Costs	$396,000
Contingency Factor, 20%	$ 79,000
Total, Mitigation Contracting Costs	$475,000
Extramural Costs (TAT)	$106,000
Intramural Costs (EPA)	$118,000
Subtotal	$699,000
Contingency Factor, 15%	$105,000
Subtotal	$804,000
Less funding remaining from Limited Action	$ 3,000
Total (Addition to the ceiling)	$801,000

FIGURE 4
PROPOSED WORK SCHEDULE



DOCUMENTS ON RESERVE

3.1 CORRESPONDENCE

3.2 SAMPLING AND ANALYSIS PLAN (SAP)

3.3 SAMPLING AND ANALYSIS DATA/CHAIN OF CUSTODY FORMS

3.4 WORK PLAN

3.5 RI REPORTS

DOCUMENTS ON RESERVE

4.1 CORRESPONDENCE

4.2 ARAR DETERMINATIONS

4.3 FS REPORTS

4.4 PROPOSED PLAN

DOCUMENTS ON RESERVE

5.1 CORRESPONDENCE

5.2 ROD

5.3 AMENDMENTS TO ROD

5.4 EXPLANATIONS OF SIGNIFICANT DIFFERENCES

DOCUMENTS ON RESERVE

6.1 CORRESPONDENCE (OTHER THAN ARARs)

6.2 COOPERATIVE AGREEMENTS/SMOAs

6.3 STATE CERTIFICATION OF ARARs

7.1

CORRESPONDENCE

Cc: CZAPOR
BASSO
KAREN

RD #2 360A COGAN STATION PA 17728

FROM REGION II

LASER PRODUCTS CORP.

Jim

1987 DEC 24 AM 11:46

DIRECTOR'S OFFICE

DEC 16, 1987

MR. STEPHEN LUFTIG, DIR. OF EMERGENCY REMEDIAL RESPONSE DIV.
US ENVIRONMENTAL PROTECTION AGENCY
REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

RE: INTERNATIONAL METALLURGICAL SERVICES
196 BLANCHARD STREET, NEWARK, NEW JERSEY

DEAR MR. LUFTIG;

CONCERNING THE PROPOSED PRIVATE CLEANUP OF 196 BLANCHARD PLEASE NOTE THE FOLLOWING:

WE WOULD HAVE NO DIFFICULTY IN PROVIDING EPA WITH ALL NECESSARY SITE-SPECIFIC WORK PLANS FOR THE CLEANUP OF 196 BLANCHARD STREET. WE COULD EVEN ARRANGE TO HAVE THE CAVANAUGH GROUP TAKE POCESSION OF THE BUILDING AND SUPPLY ALL NECESSARY PERMITS, HEALTH AND SAFETY REQUIREMENTS, AND SAMPLING ACTIVITIES INCLUDING LAB QA AND QC PROGRAMS. BEFORE WE WOULD PROVIDE YOU WITH THIS DETAILED INFORMATION WE MUST FIRST UNDERSTAND WHAT IS THE EPA'S POSITION ON THE POSSIBLE SUB-SURFACE GROUND AND WATER CONTAMINATION. WE BELIEVE FROM THE SAMPLING OF GROUND WATER AND SOIL THAT ANY CONTAMINATION FOUND IN THESE SAMPLES IS COMING FROM THE SURROUNDING AREA. WE CAN ASSURE YOU THAT WE CAN REMEDIATE THE CHEMICALS IN THE BUILDING INCLUDING DECONTAMINATION OF THE FLOORS AND WALLS. WE CAN ASSURE YOU OF PROPER DISPOSTION OF THE CHEMICALS AND REMEDIATION OF THE TOP 2 INCHES OF SOIL. WE CANNOT HOWEVER, TAKE THE POSITION OF BEING RESPONSIBLE FOR WHAT IS CLEARLY TO US CONTAMINANTS LEACHING FROM THE SURROUNDING AREAS. WE ARE AWARE OF THE CERCLA REQUIREMENTS AND ECRA REQUIREMENTS. BASED ON THE SAMPLING WE HAVE ALREADY PERFORMED WE DO NOT FEEL IT SHOULD BE A PROBLEM, BUT IT MUST BE ADDRESSED AND LEGAL LIABILITY OF THE SUB-SURFACE SOIL AND GROUND WATER MUST BE ADDRESSED BEFORE WE COULD AGREE TO UNDERTAKE THE PROPOSED CLEAN-UP.

WE DO APPRECIATE EPA BRINGING TO OUR ATTENTION THE POSSIBLE LIABILITY INCURRED IN A PROPOSED PRIVATE CLEANUP OF THIS SITE. WE DO FEEL EVERY EFFORT SHOULD BE MADE TO ALLOW THIS PRIVATE CLEANUP TO HAPPEN BECAUSE THIS WOULD BE A SHOW CASE CLEANUP AND PAVE THE WAY FOR MANY FUTURE PRIVATE CLEANUPS TO OCCUR IN NEWARK. IS IT NOT BETTER FOR INDUSTRY TO CLEAN UP THESE SITES WITH PRIVATE MONEY THAN TO CONTINUE DRAINING THE RESOURSES OF THE EPA AND THE NJDEP? WE URGE YOUR LAWYERS TO SERIOUSLY CONSIDER THE ABOVE MATTER AND REPLY TO OUR CONCERNS.

THANK YOU FOR YOUR TIME AND PATIENCE IN THESE MATTERS. WE DO APPRECIATE MR SCHMIDTBERGER'S TIME AND PATIENCE IN THESE MATTERS.

SINCERELY,

ERIC CHEETHAM
PRESIDENT

CC: JASON WORKMAN, PRESIDENT STYLE VI LIMITED
JAMES SCHMIDTBERGER, EPA SITE COMPLIANCE
DAVE BEEMAN, METRO OFFICE DEP
BOB CALANDRA, CAVANAUGH GROUP
AL ZACH, DIRECTOR OF ENGINEERING, CITY OF NEWARK

UNITED ST[illegible]S ENVIRONMENTAL PROTECTION AG[illegible]Y

NOT OFFICIAL

Enforcement Action - International Metallurgical Services, 196 Blanchard Street, Newark, New Jersey

Fred N. Rubel, Chief
Response and Prevention Branch

John Czapor, Chief
Site Compliance Branch

The State of New Jersey has requested that EPA assume the lead role and initiate a CERCLA removal action at International Metallurgical Services (IMS) in Newark, New Jersey. State investigation shows that this four story factory is a potential threat to human health and welfare and to the Passaic River.

IMS filed for Chapter 11 on April 15, 1982. The filing was changed to involuntary Chapter 7 on January 6, 1986, due to the failure of IMS to submit financial disclosure statements and a plan of reorganization. A court appointed trustee was assigned on January 17, 1986 to liquidate any assets that remain on the property. Proceeds were limited, and inability to locate the responsible party hampered the efforts on the part of the state to remove hazardous materials from the property.

NJDEP documented hundreds of containers of acids, bases, cyanides, volatile solvents and unknowns throughout the four story structure. The building is approximately 25 feet from the Passaic River. Scrap metal, machinery, drums and a 1,000 gallon above-ground tank are located outside the building. Vandals have entered the site and, therefore, pose a direct contact threat situation. Due to the threat of material leaking into the Passaic River, signs of material leaking on the ground both outside and inside the building, and a direct contact threat to trespassers, prompt action appears warranted.

The court appointed trustee is apparently sympathetic to our cause and is expected to allow site access. I ask that you assign an individual now to start the enforcement process for this site, if you have not already done so.

The OSC's assigned to this site are John Witkowski, FTS 340-6739 and John Shaw, FTS 340-6812. Your assistance in this matter will be appreciated.

cc: S. Luftig, 2ERR
K. Callahan, 2ERR-DD
D. Karlin, ORC-NJSUP

File:w/Shaw-International Metallurgical Ser. Newark, NJ
2ERR-RP:Shaw 340-6812:6/16-18-22/87 gs:Disc-#9

	2ERR-RP SHAW	2ERR-RP ZACHOS	2ERR-RP RUBEL	CONCURRENCES					
SYMBOL	H. Shaw	D.H. Zachos							
SURNAME	6/29/87	6/29/87							
DATE									

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

*U.S. GPO : 1984-436-836

Rec'd 12/7/87
JH

DEC 02 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Barbara Pannone
115 E. Elizabeth Ave. (C10)
Linden, New Jersey 07036

Re: International Metallurgical Services Site
196 Blanchard St., Newark, New Jersey

Dear Ms. Pannone:

I am writing in response to your letter of November 23, 1987 in which you requested information regarding the International Metallurgical Services (IMS) site and the Environmental Protection Agency's (EPA's) proposed clean-up activities.

EPA recently completed its preliminary assessment of the IMS site. Although the exact quantities of hazardous materials on-site are unknown, the New Jersey Department of Environmental Protection (NJDEP) estimates that over 50 drums, 450 laboratory reagent containers, 50 storage tanks, and several vats are located inside the building. Several piles of acetate film, two drums, and two twenty-foot shipping containers, one of which contains scrap circuit boards, are located outside the northern end of the building near the Passaic River. Labels from containers, the tank manifold, and air sampling indicate the substances listed in the attached table may be present on-site.

The objective of the proposed project is to remove the threat of fire and explosion as well as the threat of direct human contact with the hazardous materials present at the abandoned site. Mitigating the site can best be accomplished by sorting, segregating, and compatibility testing for disposal, followed by the disposal of the chemicals off-site. The building may also have to be decontaminated. Attached you will find a more detailed outline of the proposed work.

As you are aware, if you wish to perform the cleanup activities you may do so pursuant to an Administrative Order issued by EPA. The Order will include a provision for submission of a Detailed Work Plan for the performance of the required activities.

As you were notified in Mr. Stephen D. Luftig's letter of November 10, 1987, the estimated cost for the removal action is $1,058,000. As you can see from the attached outline, there will be a considerable amount of work necessary to properly characterize and dispose of the materials at the site. In addition to labor, materials, and equipment, the cost estimate is based upon the cost of sampling and analysis of wastes, segragating incompatible wastes, and disposing all wastes to approved off-site facilities.

If you have any questions regarding this letter, of if you would like to schedule a meeting to discuss the proposed clean-up activities, please do not hesitate to contact me at (212) 264-2646.

Sincerely yours,

James Schmidtberger, Engineer
Northern New Jersey Compliance Section

Attachments

bcc: J. McVeigh, ORC
M. Ferencevych, NJDCJ
D. Beeman, NJDEP
✓J. Shaw, ERR-RP

The following is a partial list of tasks which are proposed and being considered for the removal action at the IMS site but should not be construed as final:

1. Disposal of Hazardous Waste: Combustible debris inside the building and the spent acetate film outside will be disposed as combustible waste.

2. Waste Handling and Disposal: The material in the building will be inventoried, tested for compatibility and restaged inside the building. Several waste streams will be indentified. The material in each waste stream will be bulked and sent out as one shipment or treated on-site as outlined below.

A. Cyanides: All material will be treated at an off-site approved cyanide disposal facility. Material will be shipped in original packaging or overpacked for safe transport.

B. Solvents: Material will be bulked on-site and then tested for burn characteristics and disposed of at a proper incineration facility.

C. Acids/Bases: Acids and bases will be separated and treated at an approved off-site treatment facility or at the local Publicly Owned Treatment Works (POTW).

D. Arsenic Compounds: All arsenic compounds will be treated at an approved off-site treatment facility.

E. Mercury Compounds: All mercuric compounds will be treated at an approved off-site treatment facility.

F. Flouride Compounds: All flouride compounds will be treated at an approved off-site treatment facility.

G. Laboratory/Reagents: Laboratory chemicals will be identified and placed in drums with alternating layers of sorbent material. The lab packs will be disposed of at an incineration or landfill facility.

H. Bulk Liquids: The contents of several large storage vessels may contain alcohol or other unidentified liquids. These wastes will be disposed of by incineration, if possible.

I. Solid Waste: Solid hazardous waste will be disposed of in an approved landfill.

J. Explosive Chemicals: Any chemicals found to be potentially shock sensitive or explosive will be disposed of by trained professionals through detonation at an approved off-site location.

3. Decontamination and Decommission of Tanks, Vats and Floors: The tanks and vats will be emptied and laser cleaned. The floor and wall surfaces will be laser cleaned. The wash waters will be sampled, analyzed, and disposed of in a local POTW or at a waste water treatment facility.

4. Security: During the performance of the cleanup activities, the site must be secured.

TABLE 1

Acids

Hydrochloric acid
Sulfurous acid
Sulfuric acid
Nitric acid
Chromic acid
Pyrogallic acid
Acetic acid
Molybdic acid
Oxalic acid
Tartaric acid
Tannic acid
Formic Acid

Bases

Sodium hydroxide
Potassium hydroxide
Ammonium hydroxide
Sodium hypochlorite
Sodium hypophosphate
Potassium pyrophosphate
Potassium bromide

Solvents

Pyridine
Phenol
Methyl ethyl ketone
Hydrazine hydrate
Methyl Isobutyl ketone

Air

Hydrogen sulfide
Hydrogen cyanide
Sulfur dioxide
Asbestos

Other

Hydrozine sulfate
Sodium chromate
Sodium silico flouride
Magnesium dioxide
Magnesium choloride
Lithium metaborate
Freon 12
Vanadium pentoxide
Barium carbonate
Ammonium citrate
Ethylacetate
Magnesium Pachlorate
Lanthium nitrate
Lime, borax, soda ash
Acetylene (cylinder)
Nuodex naphthenate cobalt 6%
Fuel oil
Sodium sulfate
Copper sulfate
Nitrobenzene sulfonic acid, sodium salt
Zinc dust
Nickel powder
Ferric ammonium sulfate
Ammonium chloride
Cinchonine
Mercuric iodide
Arsenious acid
Potassium ferrocyanide
Sodium cyanide

APR 07 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jason Workman
Style VI
140 Rome Street
Newark, New Jersey 07105

Re: International Metallurgical Services Site
196 Blanchard Street, Newark, New Jersey

Dear Mr. Workman:

This letter is a response to your request to perform removal activities at the International Metallurgical Services Site ("site") in Newark, New Jersey.

The U.S. Environmental Protection Agency ("EPA") has determined the site is contaminated with hazardous substances as defined in the Comprehensive Environmental Response, Compensation, and Liability Act as amended by the Superfund Amendments and Reauthorization Act of 1986 ("CERCLA"). EPA has implemented an initial CERCLA removal action to reduce the immediate threat of fire, explosion and direct contact with the hazardous substances. In general, EPA welcomes the opportunity for private party cleanup actions at hazardous waste sites. However, EPA's discretion to permit such activities is premised on the technical and financial abilities of a party to perform satisfactorily and EPA's belief that a party is making an informed decision with the aid of legal counsel familiar with applicable federal and state regulatory requirements.

Presently, the owner of the property, International Metallurgical Services ("IMS"), is proceeding with involuntary bankruptcy. The trustee in bankruptcy responsible for liquidation of IMS assets informed me that the building and real property that comprise the site remain assets in the bankruptcy proceeding. The City of Newark has an outstanding lien on the site for delinquent real property taxes. Apparently, Newark has not foreclosed on the lien because of a reluctance to incur the costs associated with decontamination. In your letter of November 16, 1987 to EPA you expressed a desire to clean the site but stated that you must aquire legal title to the site prior to execution of an agreement with EPA. In addition, your technical advisor Eric Cheetham of Laser Products Corporation

stated in a letter of December 16, 1987 to EPA that you would not assume responsibility for subsurface decontamination. In light of these conditions, EPA takes the following position with respect to your offer to clean the site.

If you take legal title to the site, you will be an "owner" of a facility where hazardous substances were generated, stored and disposed as that term is defined under Section 101 (20)(A) of the CERCLA. Section 107 of CERCLA imposes liability on the owner of a facility where there is a release or a threatened release of a hazardous substance which causes the incurrence of response costs. An owner is liable for, including but not limited to, all costs of removal and remedial actions at the facility. Therefore, upon taking legal title to the property, you would assume strict statutory liability for any and all past, present and future response costs expended by the federal government at the site.

Section 122 (f) of CERCLA permits EPA to provide a covenant not to sue concerning any liability to the United States under CERCLA resulting from a release or threatened release of a hazardous substance addressed by a remedial action under which the party enters into a consent decree for response to a release or threatened release. The language of CERCLA limits the issuance of the convenant not to sue where remedial action is performed by a party. Remedial action means those actions consistent with a permanent remedy taken instead of or in addition to removal actions (Section 101(24) of CERCLA).

It is our understanding from your correspondence that you do not intend to perform a full soil and groundwater remediation but rather you would limit your activites to the removal of hazardous substances, contaminants and pollutants from the building and remediation of the top two inches of soil. These limited removal activites would not meet the requirements of the statute which requires implementation of permanent remedies in return for a convenant not to sue.

EPA began a CERCLA financed removal action at the site on March 7, 1988. The purpose of these activities is to reduce the threat of fire, explosion and direct contact with hazardous substances. The action will include: the removal and disposal of shock sensitive chemicals and explosives; overpacking some hazardous chemicals presently stored in deteriorating containers; separating known incompatible materials; and securing the building. EPA plans to perform a more extensive removal action in October, 1988.

Although the scope of EPA activities is presently limited to an expedited removal action followed by a more complete removal in October, it is possible that the site could be nominated to the National Priorities List (NPL). The NPL identifies the target sites for remedial action under CERCLA. Remedial action would entail further site actions including soil or groundwater cleanup activities deemed necessary under the National Contingency Plan. If you perform the planned October removal action and additional remedial work is required at some time in the future, as an owner, you would be strictly liable for all such costs.

In addition, any agreement entered into with EPA would not affect requirements of the State of New Jersey for clean-up and transfer of the property under the applicable state statutes.

You may take possession of the property and fund a removal action in light of the inability of EPA to provide a covenant not to sue. However, to ensure that the removal action is executed properly and in a timely manner in conformance with the National Contingency Plan (NCP), EPA requires before entering into an Administrative Order, the submittal of a detailed Work Plan. The detailed Work Plan should include, at minimum, the following:

1. Health and Safety Plan
2. Sampling Plan
3. Off-Site Disposal Plan

Each of the above required items are discussed below.

Health and Safety Plan (HSP)

The purpose of the HSP is to provide the framework for the safe conduct of the response actions to be taken at IMS. It will provide guidance for all contractors, sub-contractors and employees, including EPA employees, who will be involved in this project. The HSP should discuss and outline, at minimum, the following:

1. Team Organization
2. Medical Surveillance
3. Employee Training and Work Practices
4. Personnel Protection
5. Work Zone Delineation and Site Control
6. Decontamination Procedures
7. Sanitation
8. Record Keeping
9. Emergency Procedures and Information
10. First Aid and Worker Injury Contingency Plans
11. Explosion and Fire Contingency Plans.

Sampling Plan:

The sampling plan is required to provide representative environmental samples of the existing site conditions. All samples must be transported and analyzed in a reliable and consistent manner. The sampling plan should include, at minimum, the following:

1. Contractor Mobilization
2. Establishment of a Command Post
3. Sampling Procedures
4. Analytical Requirements

In order to ensure environmental monitoring is of known quality, EPA requires the contractor to address under the Sampling Procedures and Analytical Requirements all sampling procedures (i.e. drum sampling, wipe sampling, waste characterizations, etc.) which will be undertaken, provisions for field and trip blank samples, field instrument calibration, chain-of-custody reports, sample vessel decontamination, preservation and holding times of samples, data validation, and technical system audits.

Much of the analytical work in the region is performed by the EPA Contract Lab Program (CLP). CLP provides standardized and specialized analytical services to support Superfund activities and provides legally-defensible analytical results. Therefore, a high level of quality assurance and documentation is incorporated in all aspects of program activities. Your laboratory is not required to participate in the CLP program; however, non-CLP laboratories must submit as part of the Work Plan a Quality Assurance and Quality Control manual which is applicable to the analyses to be perfomed. The laboratory will be sent performance samples for those parameters applicable to the project analyzed. The lab must perform acceptably on these samples. In addition, the primary contractor must perform a technical systems audit in order to evaluate the laboratory's capability to perform the work. Be advised, there should be provisions in the sampling plan for split site samples to be collected by EPA for the purpose of montoring the results of the contracted laboratory analysis.

Disposal Plan:

Since the response actions include removing hazardous wastes and/or hazardous substances from the site, EPA requires a disposal plan. The purpose of this plan is to ensure compliance with EPA's off-site disposal policy, and in particular, to help prevent wastes from contributing to present or future environmental problems by directing these wastes to facilities which have been determined to be at this time environmentally sound. The policy incorporates all mandates of CERCLA, as amended by SARA and describes the procedures which should be followed under CERCLA.

Specifically, the receiving facility must be RCRA permitted and in compliance with all applicable regulations. Wastes cannot be disposed of at non-permitted facilities or facilities found to be in violation with RCRA or other laws. It is the contractor's and thus your responsibility to ensure that the hazardous waste is delivered to authorized facilities. The facility to which you intend to dispose of the hazardous waste must provide in the plan at the time of submittal a letter of intent to accept the hazardous waste from the site as well as proof that it is presently permitted and in compliance.

EPA will review and provide comments on the Work Plan and will require resubmittal of the draft plan with all comments addressed. After the Work Plan has undergone revisions and is approved, EPA will negotiate the terms of the Administrative Order.

In addition to the Work Plan requirements outlined above, EPA may require assurance of your commitment to the completion of this removal in the form of a letter of credit. In the event that you are unable to perform all aspects of the project, this fund could be drawn upon to complete the removal activities. As you are aware, the total cost of the proposed removal action, and thus the anticipated value of the letter of credit, is approximately one million dollars.

You may volunteer to undertake the removal action in EPA's stead by responding unequivocally in writing by the close of business on April 25, 1988 that you understand the terms of this letter and that you are aware of the deliverables and administrative procedures for proper oversight of the project by EPA. Your positive response will assure EPA that you have full knowledge of the scope of this project and the Federal statutes. Send your response to the address below:

U.S. Environmental Protection Agency
Site Compliance Branch - Room 747
26 Federal Plaza
New York, New York 10278
Attn: James Schmidtberger

with a copy to:

Joseph McVeigh, Esq.
Assistant Regional Counsel
Office of Regional Counsel - Room 437

at the same address.

If you wish to discuss this matter in further detail, please contact James Schmidtberger, of my staff, at (212) 264-2646 or Joseph McVeigh, Esq., at (212) 264-3350.

Sincerely yours,

John V. Czapor, Chief
Site Compliance Branch

cc: Eric Cheetham
Laser Products Corporation
RD2 Box 360A
Cogan Station, PA 17728

bcc: D. Karlen, ORC
J. McVeigh, ORC-NJSUP
J. Shaw, ERR-RP
J. Witkowski, ERR-RP
D. Beeman, NJDEP

NOV 13 1987

Mr. Jason Workman, President
Style VI
140 Rome Street
Newark, New Jersey 07105

Re: International Metallurgical Services Site
Newark, Essex County, New Jersey

Dear Mr. Workman:

The U.S. Environmental Protection Agency (EPA) has completed its preliminary assessment of the International Metallurgical Services (IMS) site. I am writing to inform you of the cleanup activities which EPA may perform at the IMS site.

The objective of the proposed project is to remove the threat of fire and explosion as well as the threat of direct human contact with the hazardous materials present at the abandoned site. Mitigating the site can best be accomplished by sorting, segregating, and compatibility testing for disposal, followed by the disposal of the chemicals off-site. The building will also have to be decontaminated.

The following is a partial list of tasks which are proposed and being considered for the removal action at the IMS site but should not be construed as final:

1. Disposal of Hazardous Waste: Combustible debris inside the building and the spent acetate film outside will be disposed as combustible waste.

2. Waste Handling and Disposal: The material in the building will be inventoried, tested for compatibility and restaged inside the building. Several waste streams will be identified. The material in each waste stream will be bulked and sent out as one shipment or treated on-site as outlined below.

A. Cyanides: All material will be treated at an off-site approved cyanide disposal facility. Material will be shipped in original packaging or overpacked for safe transport.

B. Solvents: Material will be bulked on-site and then tested for burn characteristics and disposed of at a proper incineration facility.

C. Acids/Bases: Acids and bases will be separated and treated on-site by addition of a neutralizing agent and disposed of at a wastewater treatment facility or at the local Publicly Owned Treatment Works (POTW).

D. Arsenic Compounds: All arsenic compounds will be treated at an approved off-site treatment facility.

E. Mercury Compounds: All mercuric compounds will be treated at an approved off-site treatment facility.

F. Flouride Compounds: All flouride compounds will be treated at an approved off-site treatment facility.

G. Reclamation/Recycling: Any material found in good condition in original packaging will be offered free of charge to the original manufacturer or a recycling facility.

H. Laboratory/Reagents: Laboratory chemicals will be identified and placed in drums with alternating layers of sorbent material. The lab packs will be disposed of at an incineration or landfill facility.

I. Bulk Liquids: The contents of several large storage vessels may contain alcohol or other unidentified liquids. These wastes will be disposed of by incineration, if possible.

J. Solid Waste: Solid hazardous waste will be disposed of in a RCRA approved landfill.

K. Explosive Chemicals: Any chemicals found to be potentially shock sensitive or explosive will be disposed of by trained professionals through detonation at an approved off-site location.

3. Decontamination and Decommission of Tanks, Vats and Floors: The tanks and vats will be emptied and laser cleaned. The floor and wall surfaces will be laser cleaned. The wash waters will be sampled, analyzed, and disposed of in a local POTW or at a waste water treatment facility. The bottom hatch will be removed so that waste cannot accumulate in the tanks and, if necessary, a hole will be drilled in the bottom of the tanks.

4. Security: During the performance of the cleanup activies, the site must be secured.

As you are aware, if you wish to perform the cleanup activities outlined herein, you may do so pursuant to an Administrative Order issued by EPA. The Order will include a provision for submission of a Detailed Work Plan for the performance of the required activities. The Work Plan should include, at minimum, the following:

- a detailed description of cleanup procedures, including identification of contractors and subcontractors and their respective responsibilities
- a health and safety plan for conducting site activities
- a schedule for performance of cleanup activities.

While neither included in the cleanup activities nor in the cost estimate, the soil on-site must be sampled and analyzed to determine whether other mitigative actions will be required. EPA will coordinate the review and oversight with New Jersey's Department of Environmental Protection including any cleanup provisions under New Jersey's Environmental Cleanup and Recovery Act (ECRA).

EPA estimates that the proposed removal action, as summarized in this letter, will cost approximately one million dollars. For your information, I have enclosed a copy of the Notice Letter sent to the former owners of the IMS site.

If you have any questions regarding this letter, the proposed tasks, or cleanup requirements, please do not hesitate to contact me at (212) 264-2646.

Sincerely yours,

James Schmidtberger, Engineer
Northern New Jersey Compliance Section

Enclosure

bcc: D. Beeman, NJDEP
J. McVeigh, ORC
J. Shaw, ERR-RP ✓

7.8

NOTICE LETTERS and RESPONSES

NOV 10 1987

CERTIFIED MAIL--
RETURN RECEIPT REQUESTED

Mr. & Mrs. Victor Pannone
115 E. Elizabeth Avenue
Linden, New Jersey 07036

Re: International Metallurgical Services, Inc.
196 Blanchard St., Newark, New Jersey

Dear Mr. & Mrs. Pannone:

The U.S. Environmental Protection Agency ("EPA") has documented the release and threatened release of hazardous substances, pollutants, and contaminants at the above-referenced site ("the facility" or "the site"). EPA is authorized to respond to this type of release under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. § 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986 ("SARA"), Pub. L. No. 99-499.

This letter constitutes official notification to you and your company that EPA may conduct, or require responsible parties to conduct, a removal action, as defined in the National Contingency Plan, 40 C.F.R. Part 300, at the International Metallurgical Services (IMS) Site. EPA has determined that such a removal action is necessary to prevent an immediate and significant risk of harm to human health and the environment, as defined at 40 C.F.R. §300.65(b).

EPA believes that as an owner or operator of the IMS Site or as a generator of hazardous substances at the facility or as a transporter of hazardous substances to the facility, you may be a responsible party under Section 107(a) of CERCLA, 42 U.S.C. §9607(a). Under CERCLA, SARA, and other laws, parties responsible for the release or threatened release of hazardous substances into the environment from an uncontrolled hazardous waste site may be liable for all monies expended by the federal government to take necessary response actions at such facilities, including investigation, planning, removal, and remedial actions at these facilities. These parties may also be held liable for any enforcement costs incurred by the government.

EPA possesses information which indicates that you may be a responsible party within the meaning of CERCLA. Before the government initiates appropriate action regarding the site, we seek to know if you will voluntarily perform the work required to abate the release or threatened release of hazardous substances from the site.

For your information, the removal action required at the site may include, but not be limited to, sampling, analysis, removal and disposal of all drummed wastes and all other wastes in containers present at the IMS site. Proper disposal of wastes present may include their removal to a secure landfill, incineration, or other appropriate disposal methods. The removal action may also include the securing of the site to prevent access by unauthorized persons.

EPA estimates that the removal action, as it has been summarized in this letter, may cost approximately $1,058,000 (one million fifty-eight thousand dollars.)

In addition to the removal action outlined in this letter, EPA will also determine, at a subsequent time, whether additional corrective measures are required to mitigate the releases from the IMS facility and to protect the public health, welfare, and the environment.

If these and other response actions are taken by EPA rather than by the responsible parties, you may be subject to a legal action pursuant to Section 107 of CERCLA, 42 U.S.C. §9607, to recover funds spent by EPA in response to the release of hazardous substances at this site.

At present, you are the only responsible parties for the contamination at the IMS site. EPA is, however, continuing its investigation to identify other responsible parties. You will be notified when and if any other potentially responsible parties have been identified.

EPA requests your cooperation in this matter. If you would prefer to undertake or finance the removal action at the site, you should promptly contact the EPA project officer, James Schmidtberger of the Site Compliance Branch at (212) 264-2646, or Joseph McVeigh of the Office of Regional Counsel, at (212) 264-3350. You should also reply in writing to this letter (a reply by certified mail is recommended) within fourteen (14) calendar days of your receipt of this letter. Your letter should be sent to:

U.S. Environmental Protection Agency
Site Compliance Branch
26 Federal Plaza, Room 747
New York, New York 10278
Attn: James Schmidtberger

If EPA does not receive a written response from you within the time specified above, EPA will assume that you decline to voluntarily undertake the removal action and EPA will pursue its options accordingly. EPA's options include issuing an administrative order pursuant to Section 106 of CERCLA to compel you to undertake the required activities, and EPA's conducting the removal action, for which costs you may be liable pursuant to Section 107 of CERCLA. If you wish to discuss the matter in any further detail, please contact either Mr. Schmidtberger or Mr. McVeigh. Please note that all communications from an attorney must be directed to Mr. McVeigh. We hope that you will give this matter your immediate attention.

Sincerely yours,

Stephen D. Luftig, Director
Emergency and Remedial Response Division

cc: Santo J. Lalomia, Esq.
Shashaty and Lalomia
140 Market Street
Paterson, NJ 07505

bcc: J. McVeigh, ORC
J. Shaw, ERR-RP ✓
D. Beeman, NJDEP
M. Ferencevych

FEB 23 1988

CERTIFIED MAIL--
RETURN RECEIPT REQUESTED

President
International Minerals & Chemical
2315 Sanders Road
North Brook, Illinois 60062

Re: International Metallurgical Services, Inc.
196 Blanchard St., Newark, New Jersey

Dear Sir or Madam:

The U.S. Environmental Protection Agency ("EPA") has documented the release and threatened release of hazardous substances, pollutants, and contaminants at the above-referenced site ("the facility" or "the site"). EPA is authorized to respond to this type of release under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. § 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986 ("SARA"), Pub. L. No. 99-499.

This letter constitutes official notification to you and your company that EPA may conduct, or require responsible parties to conduct, a removal action, as defined in the National Contingency Plan, 40 C.F.R. Part 300, at the International Metallurgical Services (IMS) Site. EPA has determined that such a removal action is necessary to prevent an immediate and significant risk of harm to human health and the environment, as defined at 40 C.F.R. §300.65(b).

EPA believes that as a past owner or operator of the IMS site or as a generator of hazardous substances at the facility or as a transporter of hazardous substances to the facility, you may be a responsible party under Section 107(a) of CERCLA, 42 U.S.C. §9607(a). Under CERCLA, SARA, and other laws, parties responsible for the release or threatened release of hazardous substances into the environment from an uncontrolled hazardous waste site may be liable for all monies expended by the federal government to take necessary response actions at such facilities, including investigation, planning, removal, and remedial actions at these facilities. These parties may also be held liable for any enforcement costs incurred by the government.

7.8

EPA possesses information which indicates that you may be a responsible party within the meaning of CERCLA. Before the government initiates appropriate action regarding the site, we seek to know if you will voluntarily perform the work required to abate the release or threatened release of hazardous substances from the site.

For your information, the removal action required at the site may include, but not be limited to, sampling, analysis, removal and disposal of all drummed wastes and all other wastes in containers present at the IMS site. Proper disposal of wastes present may include their removal to a secure landfill, incineration, or other appropriate disposal methods. The removal action may also include the securing of the site to prevent access by unauthorized persons.

EPA estimates that the removal action, as it has been summarized in this letter, may cost approximately $1,058,000 (one million fifty-eight thousand dollars.)

In addition to the removal action outlined in this letter, EPA will also determine, at a subsequent time, whether additional corrective measures are required to mitigate the releases from the IMS facility and to protect the public health, welfare, and the environment.

If these and other response actions are taken by EPA rather than by the responsible parties, you may be subject to a legal action pursuant to Section 107 of CERCLA, 42 U.S.C. §9607, to recover funds spent by EPA in response to the release of hazardous substances at this site.

The following parties have been identified by EPA to date as potentially responsible parties (PRPs) for the contamination at the site:

1. International Metallurgical Services
2. International Minerals & Chemical
3. Mr. and Mrs. Victor Pannone

Each of the parties listed above will receive a copy of this letter. EPA is continuing its investigation to identify other PRPs. You will be notified when and if any other PRPs have been identified.

EPA requests your cooperation in this matter. If you would prefer to undertake or finance the removal action at the site, you should promptly contact the EPA project officer, James Schmidtberger of the Site Compliance Branch at (212) 264-2646, or Joseph McVeigh of the Office of Regional Counsel, at (212) 264-3350. You should also reply in writing to this letter (a reply by certified mail is recommended) within fourteen (14) calendar days of your receipt of this letter. Your letter should be sent to:

U.S. Environmental Protection Agency
Site Compliance Branch
26 Federal Plaza - Room 747
New York, New York 10278
Attn: James Schmidtberger

If EPA does not receive a written response from you within the time specified above, EPA will assume that you decline to voluntarily undertake the removal action and EPA will pursue its options accordingly. EPA's options include issuing an administrative order pursuant to Section 106 of CERCLA to compel you to undertake the required activities and EPA's conducting the removal action, for which costs you may be liable pursuant to Section 107 of CERCLA. If you wish to discuss the matter in any further detail, please contact either Mr. Schmidtberger or Mr. McVeigh. Please note that all communications from an attorney must be directed to Mr. McVeigh. We hope that you will give this matter your immediate attention.

Sincerely yours,

Stephen D. Luftig, Director
Emergency and Remedial Response Division

cc: Howard Post, Esq.
International Minerals & Chemical

Mr. & Mrs. Victor Pannone
International Metallurgical Services

bcc: J. McVeigh, ORC
J. Shaw, ERR-RP ✓
D. Beeman, NJDEP
M. Perencevych

BARBARA S. PANNONE

115 East Elizabeth Avenue (C10)
Linden, New Jersey 07036

November 23, 1987

U.S. Environmental Protection Agency
Site Compliance Branch
26 Federal Plaza, Room 747
New York, NY 10278

Reference:
International Metallurgical
Services, Inc.
Newark, N.J. (196 Blanchard St.)

Attention: James Schmidtberger

Dear Mr. Schmidtberger:

This is in response to Mr. Luftig's letter dated November 10, 1987 and received by me on November 14, 1987. I visited your office on November 16, 1987, however, I was told that you would be at a seminar all week and Mr. McVeigh was not in. I called Mr. McVeigh on November 17, 1987. He suggested that I write to you.

Since I have not been on the site in approximately three years, and the property has been in the hands of the Trustee for the past two years, it would be impossible for me to discuss to above letter in an intelligent manner without the following information.

1. What are the hazardous substances on the property?

2. What are the quantities of those substances?

3. How was the figure of $1,058,000 arrived at?

Any other information that you could supply me with that would help me to understand the situation would be greatly appreciated.

After I receive the above, I will call you office for an appointment.

Very truly yours,

Barbara S. Pannone

Barbara S. Pannone

Certified Mail
Return Receipt Requested

BARBARA S. PANNONE

115 East Elizabeth Avenue (C1),
Linden, New Jersey 07036

March 14, 1988

Certified Mail

Mr. James Schmidtberger
Project Manager
Site Compliance Branch
U.S. Environmental Protection Agency
26 Federal Plaza
New York, NY 10278

RE: International Metallurgical Services, Inc. (IMS), Newark, NJ

Dear Mr. Schmidtberger:

I am in receipt of your letter of March 9, 1988 advising that you plan to commence "response actions" shortly. In fact, you initiated action some time ago.

This letter constitutes a formal request to stay any action for 45 days so I may have an opportunity to have an independent survey and assessment made by an approved independent firm.

No concrete evidence of immediate danger is given to warrant emergency action overriding the need to obtain services without an open bid or the possibility of alternative arrangements being made.

The above request is based on but not limited to the following:

1. Request for funds ($230,000) for a limited clean-up based on a "preliminary assessment" which according to your letter is incomplete is out of proportion.

2. The materials indicated in Mr. Shaw's letter are shown in the New Jersey State Environmental Protection Agency (DEP) memo dated May 9, 1987 to be in lab containers in quantities from one ounce to one quart.

3. Chemicals identified by Mr. Shaw as imminently hazardous are:

   a. magnesium perchlorate - shown to be in a lab container (minimum - one ounce, maximum - one quart).

   b. methyl ethyl ketone peroxide - according to the DEP, this is in an enclosed area with no other chemicals in the area and no exposure to light.

   c. lanthanum nitrate - same condition as a. above. According to "Dangerous Properties of Industrial Materials (sixth edition) by N. Irving Sax, this material is "very soluble in water".

I question Mr. Shaw's qualifications and credentials. What qualifies him to make a decisions encompassing handling or supervising this project. His "chicken little" approach to management gives no concrete data to substantiate an expenditure of this magnitude.

Your letters are deliberately vague. They omit quantities. Your Table I is useless without quantities. This is part of the information I have been requesting. In plain English, HOW MUCH? No plan of action with accompanying cost data has been given. You keep saying you have answered my questions. **YOU HAVE NOT!** Summaries and incomplete preliminary reports are not an answer nor can any logical actions be made on the basis of the information you state you supplied. You have never answered my questions with regard to how you arrived at any of the figures for clean-up that you have quoted. I should also like to see copies of contracts for work in progress.

Other statements are deliberately misleading (example: your letter of December 2, 1987 lists Storage Tanks - These are shown on the DEP report as "empty"; over 50 drums - upon count, only 13 show some contents, the remainder are shown as empty drum storage in Area B on the third floor; many other materials on your listing are common "household" items, i.e., bleach, borax (washing aid) drain cleaner, lime (soil preparation) - hardly considered imminently explosive).

Again, I am stating that no action should be taken until an outside assessment is made. You letters do not verify that this is a legitimate emergency warranting immediate action and the expenditure of funds without proper planning and documentation.

Very truly yours,

Barbara S. Pannone

Barbara S. Pannone

cc: Howard Post, Esq.
International Minerals & Chemicals

Stephen D. Luftig, Director
Emergency & Remedial Response Div.

8.2 ATSDR HEALTH ASSESSMENTS

UNITED STATES GOVERNMENT

2-Way Memo

INSTRUCTIONS

Use routing symbols whenever possible.

SENDER (*Originator of message*):
Use brief, informal language.
Conserve space.
Forward original and one copy.

RECEIVER (*Replier to message*):
Reply below the message, keep one copy, return one copy.

Subject: INTERNATIONAL METALLURGICAL SERVICES (IMS) NEWARK, NJ.
SOIL SAMPLE
ATSDR HEALTH ASSESSMENT

To : WILLIAM NELSON

DATE OF MESSAGE	ROUTING SYMBOL
1/19/88	

SIGNATURE OF ORIGINATOR: John J. Shaw (ERRO RPB)

TEL ~~340~~-6827 90%

TITLE OF ORIGINATOR: ENVIRONMENTAL ENGINEER
OSC

FOLD

MESSAGE

PLEASE DO AN ATSDR HEALTH ASSESSMENT FOR THE SOIL AT ABOVE SITE BASED ON THE FOLLOWING SOIL ANALYSIS:

LEAD	570 PPM
CHROMIUM	280 PPM
COPPER	990 PPM
MERCURY	5.4 PPM
BERYLLIUM	0.6 PPM (BACKGROUND); HIGHEST HIT WAS 67 ppm

2" depth + composites

REPLY

ACCORDING TO DR MARK MCCLANAHAN, THESE LEVELS IN SOIL WOULD NOT PRESENT A HEALTH THREAT - THEY ARE WHAT YOU MIGHT EXPECT TO FIND IN A HEAVY INDUSTRIAL AREA. THE LEAD LEVELS MAY BE INDICATIVE OF AN OLD METAL RECOVERY SITE, OR A GAS SPILL, ETC. THE COPPER LEVEL INDICATES A CONTAMINATION PROBLEM BUT DOES NOT POSE A HEALTH THREAT. MERCURY IS A LITTLE HIGHER THAN NATURAL LEVELS, BUT STILL NO PROBLEM. HOWEVER THE MAJOR CONCERN WOULD BE BERYLIUM IN AIR - NEED TO BE CONCERNED ABOUT DUST - AS LONG AS REAL TIME AIR MONITORING OCCURRED AND LEVELS DID NOT EXCEED 100 MICROGRAMS/M3 AND THESE LEVELS IN SOIL WERE INDICATIVE OF ON SITE LEVELS - BERYLIUM WOULDN'T BE OF CONCERN - MEASURES NEED TO BE TAKEN TO CONTROL THE DUST.

DENISE JOHNSON REGIONAL REPRESENTATIVE, ATSDR

From :

DATE OF REPLY	ROUTING SYMBOL
1/22/88	

SIGNATURE OF REPLIER: Denise Johnson

TITLE OF REPLIER: Regional Representative

☆ RETAINED BY ORIGINATOR

OPTIONAL FORM 27 (Rev. 7-81)
GSA FPMR (41 CFR) 101-11.6
NSN 7540-00-082-2447

5027-107

DOCUMENTS ON RESERVE

9.1 CORRESPONDENCE

9.2 NOTICES ISSUED

9.3 FINDINGS OF FACT

9.4 REPORTS

DOCUMENTS ON RESERVE

10.1 CORRESPONDENCE

10.2 TRANSCRIPTS

11.2 COMMUNITY RELATIONS PLAN

COMMUNITY RELATIONS PLAN
INTERNATIONAL METALLURGICAL SERVICES SITE
NEWARK, NEW JERSEY, ESSEX COUNTY

I. BACKGROUND:

A. Site Setting/Description

International Metallurgical Services (IMS) occupies about 15,000 square feet in a very old and declining industrial area at 196 Blanchard Street, Newark, New Jersey. The area is bounded on the north by the Passaic River and on the east by the Jersey Turnpike (Figure 1). The Turnpike is less than 500 yards to the east of the site. The Ironbound Section, a densely populated residential area of Newark, is located less than 1.5 miles to the southwest. More than 35,000 people live and work within one mile of the site. Approximately 40 feet southwest of the site is a busy tavern.

The building is surrounded on two sides by very strong, secure, corrugated steel fencing. On the third side is a chain link fence with a small gate (welded shut). The river, about 25 feet from the building, forms the fourth boundary of the site.

B. Brief History

IMS operated a precious metals refining facility at this site up until November 1984. Principal operations included the recovery of silver from used photographic film, recovery of gold from used electronic circuit boards, and the upgrading of medium grade gold to bullion grade.

For some period of time up to 1976, Commercial Solvents Corporation, a subsidiary of International Minerals and Chemical Corporation, occupied the site. Based on the labels on the tank wagon loading/unloading manifold, products or raw materials handled were alcohols and solvents.

IMS filed for Chapter 11 on April 15, 1982. The filing was changed to involuntary Chapter 7 on January 6, 1986. Salable equipment was auctioned off by the Court appointed trustee, Santo J. Lalomia, Esq. After payment to creditors, the reported assets remaining are approximately $1,700 in cash and the building and surrounding grounds. Hazardous wastes remain in containers in the building. The city of Newark has refused to foreclose on some $98,000 in back property taxes and is requesting assistance in removing the hazardous waste.

The IMS facility remains fairly intact despite repeated acts of vandalism. Figure 2 provides a plan view of the building and property.

C. Quantities and Types of Substances Present:

Although the exact quantity of hazardous materials on-site is unknown, the New Jersey Department of Environmental Protection (NJDEP) inventory estimates that over 50 drums, 450 laboratory reagent containers, 50 storage tanks and several vats are located inside the building. Contents of these vessels vary, with many considered unknowns. ~~Several piles~~ 100 cubic yards of combustible spent acetate film and two 20 foot shipping containers (one empty), the other filled with scrap circuit boards and two drums are found outside the building near the Passaic River. The total number of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) designated extremely hazardous substances inside and outside the building amounted to thirteen. Air monitoring and analyses revealed the presence of hazardous materials in the air.

Among the hazardous chemicals found in the building are heavy metals, cyanides, sulfurous acid, sulfuric acid, nitric acid, formic acid, sodium hydroxide, pyridine, phenol, hydrazine hydrate, vanadium pentoxide, ethylacetate, nickel powder and ammonium chloride. In the air was found hydrogen sulfide, hydrogen cyanide, sulfur dioxide and nitrogen oxides. In addition, asbestos was found as insulation material on a pipe and as dust in the ~~the~~ air.

II. THREAT:

A. Threat to Public Exposure:

Fire and Explosion -

A serious threat of fire and explosion exists at this site.

It is simple for people to gain access to the site from the unfenced river side and then forcing one of the building doors.

In addition to arson, other potential sources of fire and explosion include lightning and reaction of incompatible or unstable chemicals.

In the event of fire and/or explosion, toxic fumes could present a significant threat to the surrounding worker and commuter population.

Direct Contact -

This site poses a serious direct contact threat to people. It has already been mentioned that people have invaded the site. There have been leaking drums, overturned drums and broken bottles. Direct exposure of a vandal or trespasser through inhalation of toxic chemicals or contact with strong acids and/or bases is a possibility.

B. Previous Actions to Abate Threat:

On August 19, 1986, the building entrances were secured and locked by the Fire Department.

The NJDEP has notified the bankruptcy trustee, Mr. Laloma, to make him aware of "a potentially hazardous condition" at 196 Blanchard Street.

On June 1, 1987, after periodic acts of vandalism, resulting in NJDEP responses to secure leaking drums, the NJDEP requested EPA to assume the lead role.

NJDEP and the EPA have installed locks on gates and doors. In addition, warning signs were installed on the fences and the building. The EPA has continued to monitor the site by making periodic visits. In fact, on October 16, 1987, the EPA discovered a break in.

III. PROPOSED PROJECT:

A. Objective of the Project:

The objective of the proposed project is to remove the threat of fire and explosion and the threat of direct contact with hazardous substances abandoned at this site. Site security will be maintained throughout the project.

Although extensive decontamination of the building will be required, it is not the objective of this project to entirely decontaminate and decommission this facility. Chemical and physical hazards will be removed to the extent practical to effect a safe and efficient removal action.

B. Objectives of the Commnuity Relations Plan

1) Make available accurate, understandable information to interested local citizens, elected officials, and the media.

2) Integrate the local, state and federal responses.

3) Assist public acceptance of the chosen response action.

4) Enlist the assistance of local officials as needed.

The group to whom the plan is directed are: citizen groups, local businesses, elected officials, and local, state, and federal agencies working in association with Region II EPA.

Community relations information will be supplied by EPA's Office of External Programs (OEP) with the cognizance of the Office of the Regional Adminstrator.

C. Community Relations Activities

Date(s)	Activities	Objective	Staff
As needed	Meeting with state, county, and local officials	To develop local contingency plans	OSC OEP Rep.
As needed	Press release	To brief local community and press with information on site status	OSC OEP Rep.
As needed	Site tours	Local and state governemnt officials	OSC OEP Rep.
As needed	Fact sheet	Provide removal activity information to affected public	OSC OEP Rep.
As needed	Briefings	To inform state and local officials about on going developments at the site	OSC OEP Rep.

NOTE: OSC - The EPA's On-Scene Coordinator

Date(s)	Activities	Objective	Staff
As needed	Public meetings	To discuss the need for response, review key decision points, explain the cleanup methods and response to concerns	OSC OEP Rep.

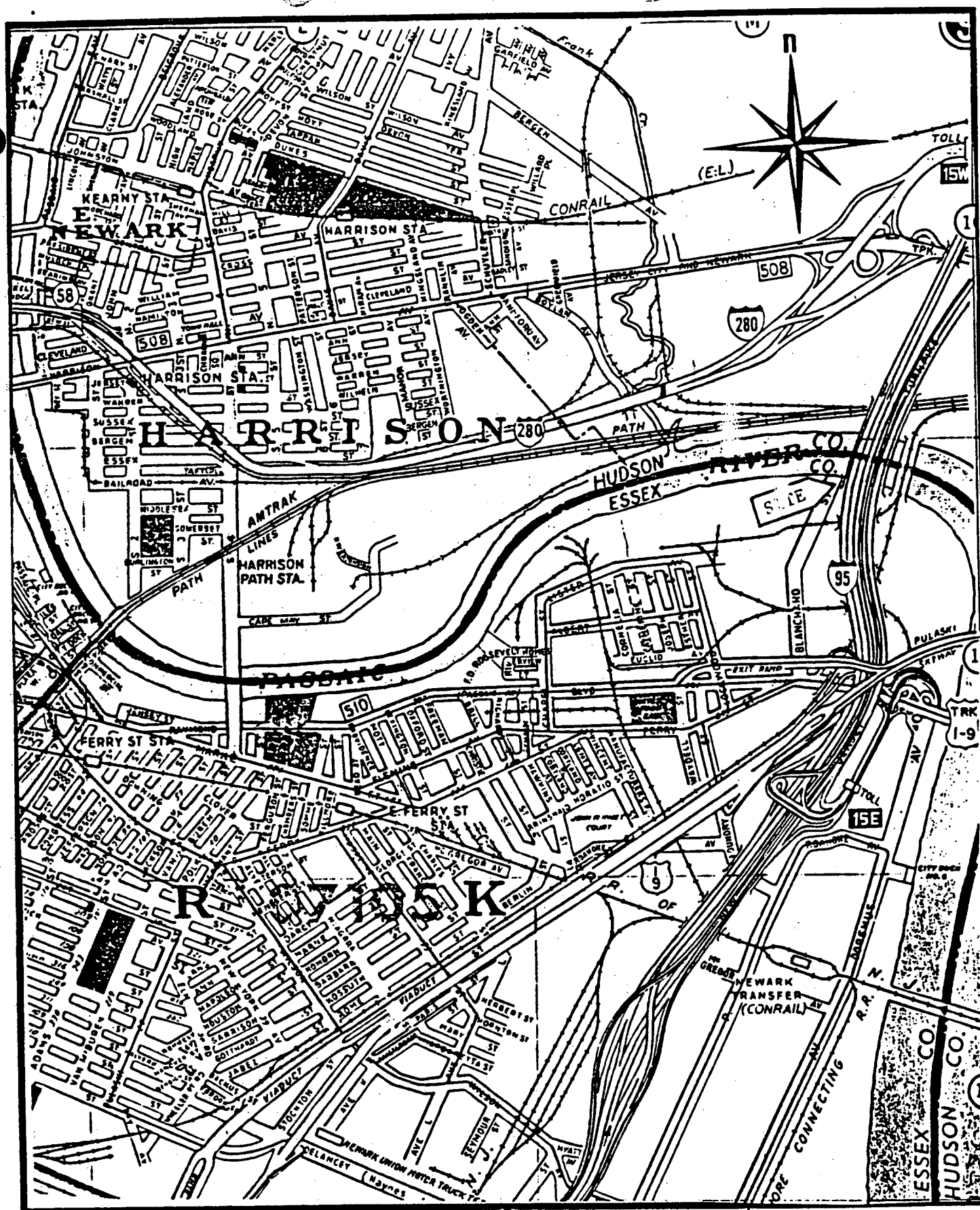
D. Key Officials and Contacts

Federal Agencies	Telephone
EPA Region II, Response and Prevention Branch - John Shaw, OSC	(201) 906-~~6021~~ 6827
EPA Region II, Office of External Programs - Margaret Randol - Rich Cahill - Herman Phillips - Lillian Johnson	(212) 264-2515
Federal Officials	
Senator Bill Bradley	(201) 926-4848
Senator Frank Lautenberg	(201) 645-3030
Congressman Peter Rodino	(201) 645-3213
New Jersey State Agencies	
New Jersey Department of Environmental Protection - David Beeman	(201) 669-3960
New Jersey State Officials	
Senator Wynona Lipman	(201) 622-0007
Assemblyman Willie Brown	(201) 926-4494
Assemblyman Eugene Thompson	(201) 624-1657
Essex County Officials	
County Executive - Nicholas Amato	(201) 621-4400
- County Health Department	(201) 266-1910
City of Newark Agencies	
Police Emergencies	911
Police Headquarters	(201) 733-6018

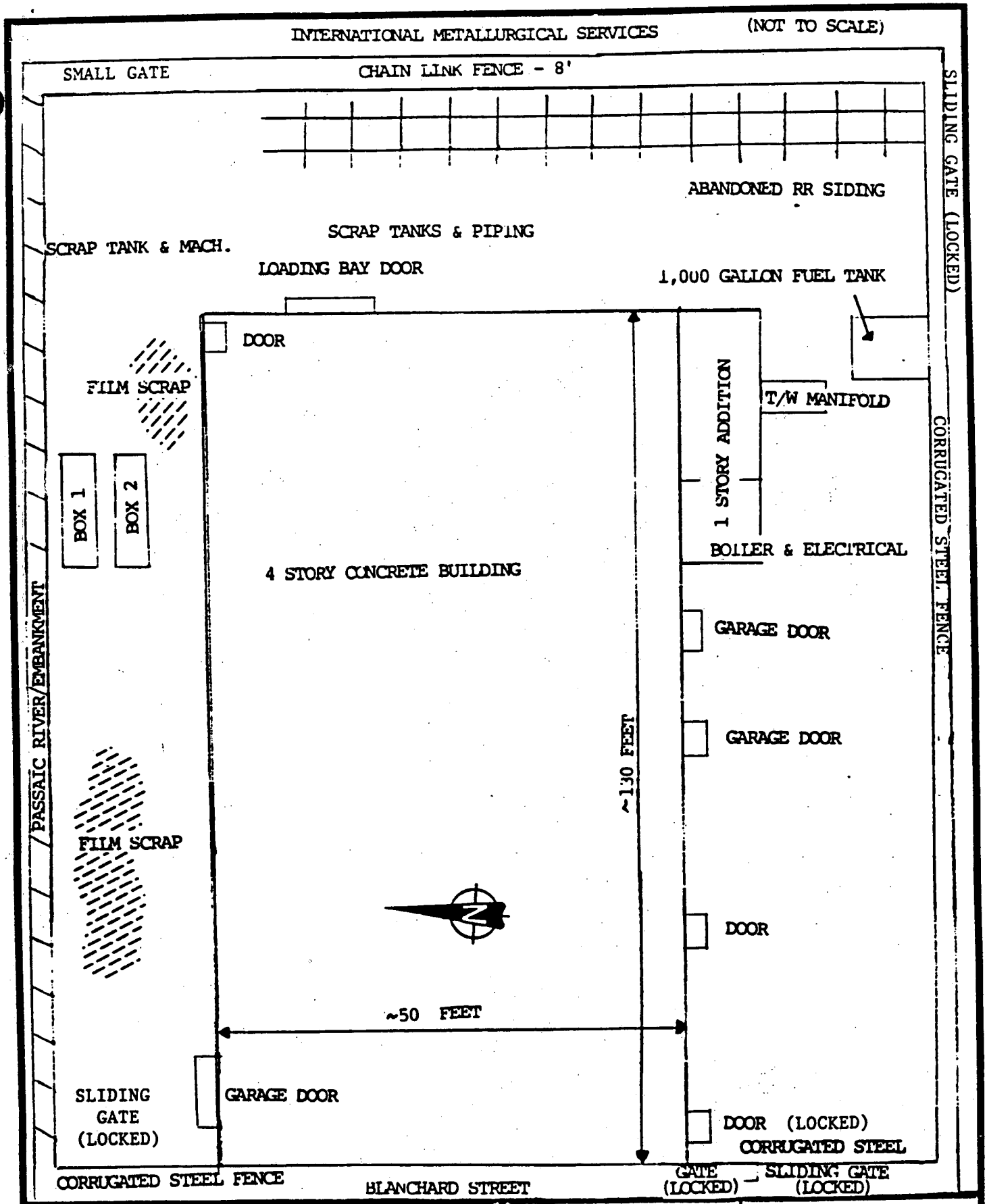
	Telephone
Fire Department Emergencies	(201) 733-7400
Fire Department Headquarters	(201) 733-7401
Fire Chief, Stanley Kossup, Newark Fire Department	(201) 733-7401
Deputy Chief A. Freda, Hazardous Materials Officer	(201) 733-7401
Mayor's Office	(201) 733-6400

Area Newspapers

Newark Star Ledger	(201) 877-4141
Daily News	(212) 210-2100
New York Times	(201) 624-2130



WESTON SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM JOHN SHAW	FIGURE 1
In Association with ICF Technology Inc., C.C. Johnson & Associates, Inc., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.	TAT PM MICHAEL MENTZER	SITE LOCATION IMS NEWARK, NJ



WESTON — SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM JOHN SHAW	FIGURE 2
In Association with ICF Technology Inc., C.C. Johnson & Associates, Inc., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.	TAT PM MICHAEL MENTZEL	SITE LAYOUT IMS NEWARK, NJ

11.3

PUBLIC NOTICE OF AVALIBILITY OF INFORMATION, NOTICE OF MEETINGS

DOCUMENTS AVAILABLE FOR PUBLIC REVIEW ON THE USEOA'S ACTION AT THE INTERNATIONAL METALLURGICAL SERVICES INC., NEWARK, N.J. CERCLA REMOVEAL FUNDED.

Government documents are now available for public review relating to the U.S. Environmental Protection Agency (EPA) planned removal of potentially hazardous wastes under the federal Superfund program at the International Metallurgical Services site in the Ironbound section of Newark, New Jersey. This is the final phase of the EPA action removal which was first started in march 1988. At that time, shock sensitive and other hazardous wastes were removed from the site.

The documents, whicha are a part of the administrative record on the site, include various reports and studies which form the basis of EPA's remedy for the problems posed by this facility.

International Metallurgical Services, was a precios metals refinery which recovered silver from photographic film and gold from printed circuit boards. The company declared bankruptcy in 1982, and has since left the building and the surrounding property abandoned. Among the wastes hat were left on-site are acids, bases, oxidizers, cyanides, flammable and combustible material.

The final phases of EPA's action involves the identification of unknown wastes at the site which will be bulked with other compatible wastes for eventual disposal. In addition, known wastes with similar characteristics will be packaged for disposal. The consolidation and securing of these wastes was completed in mid November. These materials will be shipped offsite for disposal once the proper facilities have been selected. The total cost of the removal is expected to exceed $1 million.

The administrative record is available for review during normal business hours at the following locations.

IMS U.S. EPA-Region II
196 Blanchard St. and Woodbridge Avenue
Newark, N.J. Edison, N.J.
IMS only during site activities.

Verified sampling data and documentation
U.S. EPA Region II
Woodbridge Avenue
Edison, N.J.

Guidance documents and technical literature
Central Library,
U.S. EPA-Region II
26 Federal Plaza
New York, N.Y.

Written comments on the administrative record should be sent to

Lilliam Johnson
Office of External Progams
U.S. EPA-Region II
26 Federal Plaza
New York, N.J. 10278

$105.00

STATE OF NEW JERSEY }
COUNTY OF ESSEX } ss

Muriel Lawson

Being duly sworn, according to law, on h[illegible] oath sayeth that [illegible]he is Clerk of the Star-Ledger, in said County of Essex, and that the notice, of which the attached is a copy, was published in said paper on the 28 day of Dec 88 and continued therein for _____ successively, at least once in each _____ for _____

Muriel Lawson

Sworn to and subscribed before me this 29 day of Dec, 19 88

Margaret Lawton

NOTARY PUBLIC of NEW JERSEY

DI-10

MARGARET LAWTON
Notary Public of New Jersey
My Commission Expires Dec. 2, 1990

11.9

NEWSPAPER ARTICLES

DEP secures factory containing leaking acid

By FREDERICK W. BYRD

Workers from the state Department of Environmental Protection (DEP) yesterday secured an abandoned warehouse in Newark after fire officials found drums of toxic chemicals inside were leaking.

David Beeman, a DEP official at the site, said some 50 barrels of hydrozine hydrate, a nonflammable corrosive, and other various acids were stored at 196 Blanchard St.

The building housed the International Metallurgical Services Co., a bankrupt firm which ceased operations early last year, according to fire department officials.

Deputy Fire Chief John Higginson explained that since the closing, "The bankruptcy trustee has boarded up the building but we have gone down there several times and found it reopened.

"We went there again Thursday, found it wide open and found several drums on the second floor were leaking," he said. The building is a four-story brick factory structure.

He speculated the property was reopened by vandals intent on stealing whatever valuables they could find inside.

Larry Krieger, another fire department spokesman, said several police officers were stationed outside the building Thursday night to prevent further entries.

Higginson added: "We cited them for violations of the fire codes in August and since then have been fining them $150 or $125 per day. The fines now are more than $30,000.

"The trustee told us he has no money to remove the toxic material," he added.

Higginson said the next municipal court hearing on the issue is scheduled for May 22.

Yesterday, DEP officials uprighted one drum that was leaking acid, secured several others and began legal action to have state workers clean out the site and put a lien on the property.

The bankruptcy trustee, Santo Lalomia, an attorney from Paterson, explained: "The business has only a couple of thousand dollars in its estate and that is barely enough for us to board up the place.

"I tried to sell it, and people who were interested sent in engineers to estimate the cleanup costs. They said it would be several hundred thousand dollars and that was so prohibitive they didn't want to go forward with a purchase.

"So we have been talking with the state about cleaning it up and putting a lien on the property," he added.

Lalomia said International Metallurgical Supply Co. was a precious metal refining firm. "They extracted the silver out of old film," he added.

City Council President Henry Martinez said in addition to the fines, the property owes Newark some $98,0 back property taxes. "But if the forecloses, we become responsibl the cleanup and we are reluctant that," he said.

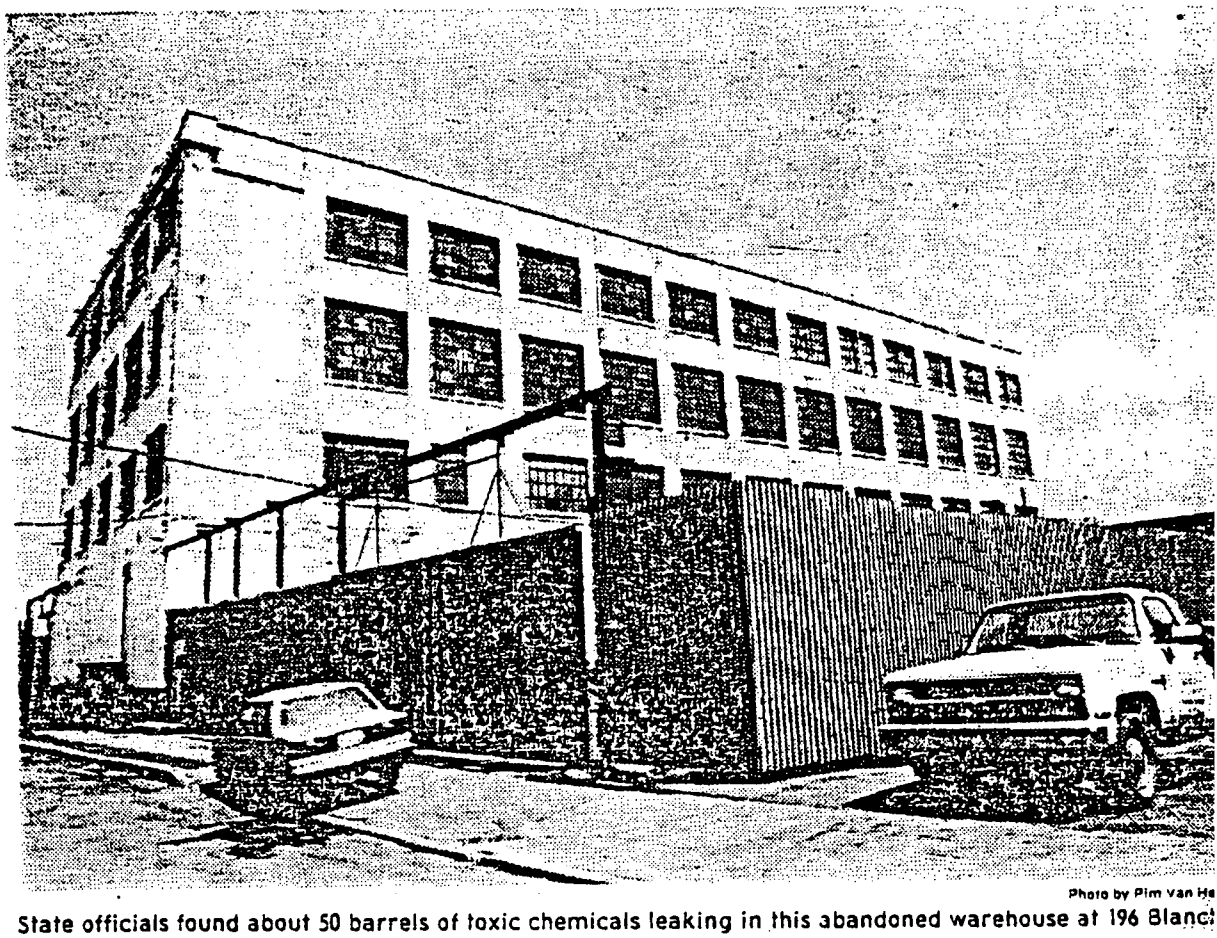


Photo by Pim van He

State officials found about 50 barrels of toxic chemicals leaking in this abandoned warehouse at 196 Blanch St., Newark

Ex-plant chief loses license in sewage case

By CATHY BUGMAN

A Superior Court judge in Somerville yesterday ordered the former su-

Blazovsky also pleaded guilty to official misconduct, conceding he failed to use enough chlorine in water treatment. Additional charges of falsifying

Special Newark fire team rolls when hazardous materials pose a danger

By KINGA BORONDY

When Newark's hazardous materials unit was created in 1985, the firefighters who volunteered to serve on the squad responded to 15 emergencies involving spilled chemicals.

Last year, they responded to 200 calls. The requests for emergency assistance ranged from investigating a lone, abandoned 55-gallon drum of an unidentifed substance to containing and abating a spill of TDI, toluene di-isocyanate, a chemical sister of methyl isocyanate, the substance that killed thousands and maimed tens of thousands in Bhophal, India, in 1984.

Fire and city officials claim the increased costs of garbage disposal and hazardous waste storage and treatment has increased the number of calls for the expertise of the hazmat unit. But the unit also has become busier as workers and residents learn that the unit exists and is available to respond to emergency situations.

Members of the unit say "we play for real" and want everybody in Newark to realize the unit exists.

"We have the equipment, men and the knowledge; now we're bringing it all together," said Capt. Anthony Apostolico of the Newark Rescue Squad. The members of the unit, formed by the four tours of Rescue 1 and Truck 1, have been called by many the best trained and best equipped unit in New Jersey.

The team has gained its reputation through its field work, its interactions with the city's chemical and manufacturing companies and its work with the state and federal environmental protection agencies.

The companies have called on the firefighters to tour their factories and plants to learn the layouts and the location and type of chemicals used, created and stored.

The environmental agencies rely on the team to respond to emergencies and disasters. The regulatory agencies also invite the firefighters to familiarize themselves with hazardous situations throughout the city that could become emergencies.

Newark Fire Director Claude Coleman routinely boasts about his men. The unit is funded by a 5 percent gross receipts tax paid to the city by Chemical Waste Management Co. The enterprise is licensed to treat, store and dispose of substances regulated by the state Department of Environmental Protection.

The city recently purchased a new truck for the hazmat team with the tax receipts. The vehicle cost about $200,000, and is stocked with equipment costing about $500,000, everything from a computer linking the firefighters to a central chemical data base, microfiche, wind monitoring equipment, and a sophisticated radio system to refrigerated Gatorade.

Last month, the first tour donned Tyvek suits—plasticized paper garments—hoods, masks and oxygen tanks to tour an abandoned metallurgical plant in Ironbound section. When the owners abandoned the plant, which removed silver from X-rays and other photographic materials, they left behind their entire chemical inventory, including the solvent methyethylkeaton peroxide, a chemical that becomes explosive when it crystallizes.

The federal Environmental Protection Agency has designated the factory as an emergency cleanup site but does not have the money to clear and decontaminate the building.

"We're segregating the chemicals to stabalize the situation, and some will be removed," said John Shaw, an EPA employee. Once the cash flow improves, the federal government plans to return to Newark to clean the site completely.

"We want to know where things are in case we have to respond in an emergency," said Capt. Walter Brownlee. Fire officials would not disclose the name or location of the company in an effort to discourage vandals. Some of the chemicals are corrosive, others flammable, all are potentially hazardous, fire officials said.

That blustry March day, the firefighters dressed slowly and deliberately, taping their plasticized gloves and boots to the bodies of their suits to ensure that not even the smallest milimeter of flesh was exposed to the contaminants inside the building.

"This suit doesn't weigh much," said Michael Wells, one of the firefighters dressed like a science fiction fantasy. The garment, also called a "splash suit," offers a minimum of protection from less-hazardous chemicals and can be disposed of after it is used.

Other suits used by the firefighters when they are trying to stop a leak or contain a spill are more cumbersome but offer the firefighters full protection against the arsenic compounds, the chlorine gases and other chemicals that maim and kill.

It takes two men to dress in the encapsulated suits. One firefighter helps the other dress, fastening the closures and adjusting the helmet. Once the firefighter is dressed, a third person checks the suit to ensure it is properly sealed.

"We want to be sure that the man isn't at risk today, or five years from now, we want to be sure we are not exposing him to carcinogens or risking his lungs," said Capt. Charles Luxton of Truck 1. "We want to make sure he doesn't track the chemical back to the firehouse or home to his family."

So obsessed are the men with safety that when there was a doubt about whether Peter Torres' boots had been splashed with water being used to wash down a contaminated suit, the firefighters disposed of the boots rather than risk contaminating the firehouse and their own homes.

When the firefighters arrive at the scene of an emergency, they study the situation to determine the problem, then set up their equipment, from lights to the decontamination tent. "There is no rush," Luxton said. "We want to think out the situation, determine what to do. We don't want to jeopardize lives."

Photo by Rich Krauss

Members of the Newark hazmat team enter a building on Blanchard Street to check for hazardous materials

"We talk," Apostolico said. If they don't know what the chemical is, they try to decide what it isn't, then they decide how much protection they need. Once dressed, the firefighters can approach the situation more securely, with less risk, to better decide how to stop the leak or spill and how to best contain the spilled material.

Even when the unit knows the identity of the substance involved in an emergency, it will act as slowly and deliberately as it does when the spill involves an unknown, and potentially deadly, chemical.

"The basic premise is to think before you act," Apostolico said. "Chemicals are developed every day and we have no idea of their effect on the human body."

Luxton said that even if the chief calls in to report finding a 55-gallon drum of petrified peanut butter, it might be an hour before the hazmat unit approaches the container.

"We'll set up a detoxification tent and a communications center before we send in a man," he said. "There is no situation in which we will risk a man before we know what is going on."

The hazmat unit's job is to stop, neutralize and contain an emergency. Once the emergency is taken care of, the job is over.

"If by turning a screw or turning a valve we can solve the problem, then we do it," Apostolico said. "We neutralize, stop the leak and contain the chemical."

Sometimes, all it takes to stop a chemical leak is a little ingenuity and overpacking material—like when the team turned a 55-gallon container upside down after a worker punctured the bottom of the barrel. At other times, all they can do is surround the mess with a plastic bubble and wait for the state Department of Environmental Protection to call in a company to clean up the spill.

"Once we respond and arrive, we're responsible for the spill," said Michael Crawley, adding they never clean the substance, because once the city packs it up and removes it, the city becomes responsible for its proper disposal. So the hazmat team calls DEP to authorize and supervise the cleanup.

"It can cost $1,000 to dispose of one drum of material properly," Crawley said.

The state can put pressure on the company owner to clean the spill, and if it can't find the owner, the state can open the New Jersey Spill Fund to pay for the cleanup costs, said Nell Mulvey, the assistant director of environmental quality for the DEP. Many major companies—Exxon and Mobil—clean their own spills after accidents, others, like DuPont, have their own emergency response team.

If the state pays for the cleanup, it can sue an identifiable owner to recover up to three times its costs. The spill fund is nourished by a tax on industries that use hazardous materials, Mulvey said.

By law, the DEP must be notified of all chemical accidents by the city or the agency responsible for the spills.

A new right-to-know statute will keep New Jersey residents, and the state's fire departments, abreast of chemicals made, used or stored throughout New Jersey's industrial and commercial buildings. The new law also requires that a company test its grounds for contamination before the building can be sold.

The high cost of disposing of chemicals properly and the new right-to-know law leads to illegal dumping and abandonment of warehouses and property, said Robert Swales, the director of the city's office of Emergency Management. The office responds to all large-scale disasters in the city, and Swales is notified of any chemical accidents or disasters.

Swales represents the city at the incidents and coordinates the different agencies that respond to the accident. Swales stays on the scene until it has been resolved and follows it up.

As a city representative, and a former police officer, Swales likes to look for incidents of illegal dumping, and regularly tours the city. He pays special attention to the industrial and rural sections of Newark, where dumpers can slip in unseen, unload their debris and chemicals and leave without being noticed.

In the fields that dot the city, Swales looks for fresh tire tracks, dead animals and foliage and other signs that indicate toxic liquids have been spilled onto the ground.

"We have found bags of garbage, appliances that could be recycled and even rotten meat dumped throughout the city. They'll dump anywhere," Swales said, explaining it can cost $300,000 to dispose of one barrel of some substances, a cost that is circumvented if the material is dropped off in a deserted area of the city.

At least two companies in Newark solved their disposal problems by abandoning them, leaving their buildings with all the chemicals inside. "It looked like the owners just locked the door one morning and never came back," Swales said.

Both locations, the metallurgical firm and another company, are under the auspices of the EPA and are slated for cleanup. The hazmat team has toured each structure and knows what chemicals are still in the buildings and where they are stored.

In their free time, the teams tour companies throughout the city, attend lectures and seminars and take turns familiarizing themselves with their new equipment.

Each also performs their specific fire-related duties. Truck 1 responds to fires in its district, its job being to ventilate a building and help extinguish a blaze.

Rescue 1 rides to all fires and accidents in the city, with its job to search and clear burning structures, remove victims from wrecked vehicles and respond to industrial accidents and stuck elevators.

The squad members all are trained emergency medical technicians, firefighters and handy with tools. "Rescue inherited the hazmat because the men were already used to working with heavy equipment and specialized tools," Apostolico said.

Truck 1 became involved when the Newark Rescue Squad was scouting for additional men. Now eight firefighters, two officers and a battalion chief work the hazmat unit during each of four tours.

"Between the two units, we have all the men and equipment we need," said Cawley.

Amato 'borrows' pres

DOCUMENTS ON RESERVE

12.1 EPA HEADQUARTERS GUIDANCE

12.2 EPA REGIONAL GUIDANCE

12.3 STATE GUIDANCE

12.4 TECHNICAL SOURCES